

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE LITIGATION

MDL No. 1456

THIS DOCUMENT RELATES TO:

CIVIL ACTION: 01-CV-12257-PBS

ALL ACTIONS

Judge Patti B. Saris

**PLAINTIFFS' SECOND AMENDED DISCLOSURES PURSUANT TO THE COURT'S
AMENDED PRETRIAL ORDER OF AUGUST 21, 2006**

I. TRIAL WITNESSES CALLED LIVE (NOT IN ORDER OF APPEARANCE)

A. Experts

Plaintiffs reserve the right to call any witnesses identified by Defendants whom are beyond the subpoena power of the Court but whom Defendants intend to bring to trial.

Name and Address	Will Testify	May Testify
Raymond S. Hartman Greylock McKinnon & Associates One Memorial Drive, 14 th Floor Cambridge, MA 02142 (617) 871-6900	X	
Meredith Rosenthal Harvard School of Public Health 677 Huntington Avenue, Room 4, Kresge Bldg. Boston, MA 02115 (617) 432-3418	X	
Richard Frank ¹ Department of Health Care Policy Harvard University 180 Longwood Ave Boston, MA 02115 (617) 432-0178		X

¹ Plaintiffs designate Richard Frank as a reply expert in light of Defendants' disclosures.

B. Other Witnesses

Plaintiffs reserve the right to call any witnesses identified by Defendants.

1. Former or Current AZ employees

David R. Brennan 15 Stanhope Gate London W1K 1LN United Kingdom		X
Charles Daddona 19 Jessica Drive Merrimack, NH 03054-3569 (603) 424-2327	X	
Genie Glessner 15 Clipper Circle Yarmout, ME 04096-7918	X	

2. Former or Current BMS employees or officers

Christof A. Marre 49 Wahban Hill Road North Chestnut Hill, MA 02467		X
John F. Akszin Vice President of Government Relations & Managed Care Services OTN 7617 Balson Avenue St. Louis, MO 63130		X
Anthony C. Hooper President & U.S. Pharmaceuticals and Member of the Executive Committee Bristol-Myers Squibb c/o Hogan & Hartson LLP 875 Third Avenue New York, NY 10022		X
Gregory K. Bell Charles River Associates Inc. John Hancock Tower 200 Clarendon Street, 33rd Floor Boston MA 02116-5092 617-425-3000		X

3. Former or current J&J employees or officers

Jim Bivona 33 Armands Way Dunbarton, NH 03046		X
Julie McHugh Centocor, Inc. 850 Ridgeway Drive Horsham, PA 19044		X
Joseph Scodari One Johnson & Johnson Plaza Newbrunswick, NJ 08933		X
Cathleen Dooley Johnson & Johnson 1350 I Street, N.W. Washington, DC 20005		X
James "Dick" Robbins Ortho Biotech Products, L.P. 430 Route 22 East P.O. Box 6914 Bridgewater, NJ 08807-0914		X
Mark Duxbury 2808 Queens Way, No. A1 Milton, WA 98354		X

4. Former or current SP officers or employees

Charles Alcorn 1405 Alsace Rd. Reading, PA 19604		X
Beatrice Manning 114 Packard Rd. Stow, MA 01775		X
G. Raymond Pironti, Jr. 19010 Cour Ests Lutz, FL 335 5 8		X
Harvey J. Weintraub 34 Woodcrest Drive Convent Station, New Jersey 07961		X

5. Sheet Metal Workers National Health Fund

Glenn Randle Trustee Sheet Metal Workers National Health Fund 8304 Adirondack Trail Austin, TX 78759-8002		X
Sharon Faulkner Vice President Southern Benefits Administrators, Inc. 2001 Caldwell Dr. Goodlettsville, TN 37072-3589		X

6. Representatives of the Pipefitters Fund

Charles Hannaford Administrator 35 Travis Street, Unit One Allston, MA 02134	X	
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7. Representatives of Blue Cross Blue Shield

Deborah Devaux Senior Vice President for Health Care Contract Management Blue Cross Blue Shield of Massachusetts Landmark Center 401 Park Drive Boston, MA 02215-3326	X	
Michael T. Mulrey Manager of Professional Provider Reimbursement, Department of Actuarial Services Blue Cross Blue Shield of Massachusetts Landmark Center 401 Park Drive Boston, MA 02215-3326		X
Maureen Coneys Senior Vice President, Health and Wellness in Health Care Services Blue Cross Blue Shield of Massachusetts Landmark Center 401 Park Drive Boston, MA 02215-3326		X

Kenneth Arruda Director of Senior and Individual Plans Blue Cross Blue Shield of Massachusetts Landmark Center 401 Park Drive Boston, MA 02215-3326		X
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8. Representatives of UFCW

Dan Ryan UFCW Midwest Fund Administrator Room 300 1300 Higgins Road Park Ridge, IL 60068	X (If the Court admits evidence from TPPs outside Massachusetts plaintiffs will call Mr. Ryan)	
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9. Consumers or Class Members

Gina M. Alongi Administrator Intl. Union of Operating Engineers Local 4 Benefit Funds 16 Trotter Drive Medway, MA 02053		X
Cheryl Barreca (Consumer for J&J, BMS and GSK) 208 Glasgow Lane Schaumburg, IL 60194		X
Anna Choise (Consumer for AZ) 3028 W. Belden Ave., #3B Chicago, IL 60647		X
Tracy Garcia (Consumer for BMS & Schering) 10737 Laporte Avenue Oak Lawn, IL 60453		X
Rebecca Hopkins 10262 East Lake Road North East, PA 16428		X

II. DESIGNATION OF WITNESSES BY DEPOSITION TESTIMONY²

A. AstraZeneca

1. Robert A. Berkman, M.D.
2. Robert C. Black
3. Christopher Waldo Bowman
4. David R. Brennan³
5. Steve Bucknavage
6. Thomas Chen
7. Sean Coakley
8. John R. Freeberry
9. Stanley Hopkins
10. Keith Patterson
11. Mark Reisenauer
12. Erik Schultz
13. Steven E. Strand
14. Carol L. Ware

B. BMS Group

1. John F. Akscin
2. Gena Cook
3. Dianne Ihling
4. Denise M. Kaszuba

² The designated pages are referenced in a separate pleading.

³ Because AstraZeneca has both refused to accept service of the trial subpoena directed to Mr. Brennan or to make him available to testify, Plaintiffs reserve the right to use the video deposition of Mr. Brennan (Plaintiffs' Exhibit 174A) at trial.

5. Greg Keighley
6. Christof A. Marre
7. Marsha Peterson
8. Douglas Soule
9. Zoltan Szabo

C. Johnson & Johnson

1. James Bivona
2. Cheryl Cohen
3. John Dempsey
4. Cathleen Dooley
5. Laura Glassco
6. Patricia Hawley
7. John Hess
8. David Holveck
9. Elaine Kling
10. Julie McHugh
11. Diane Ortiz
12. William Pearson
13. Christine Poon
14. James Robbins
15. Joseph Scodari
16. Carol Webb
17. Michael Ziskind

D. Schering-Plough

1. Gary Bishop
2. James Butler
3. Raul Cesan
4. Portia Edens
5. Mark Flynn
6. John Giannone
7. Robert Gloden
8. Walter Gough
9. Alfred Lee Graf
10. Peter Kamins
11. Debra Kane
12. Ramon Kapur
13. Thomas Kelly⁴
14. Brian Longstreet
15. Louis E. Manfredi
16. Art Monaghan
17. John Van Schaften
18. Jerome Sherman
19. Harvey Weintraub
20. Richard W. Zahn

⁴ Plaintiffs inadvertently omitted the deposition of Thomas Kelly dated June 15, 2004 from their disclosures. Plaintiffs will supplement their deposition designations to include this deposition.

III. EXHIBITS⁵

Plaintiffs reserve the right to introduce any exhibits or portions thereof identified by Defendants. Plaintiffs also reserve the right to use any pleading filed in the litigation as an exhibit. Plaintiffs also reserve the right to withdraw exhibits presently included in their list based on the Court's rulings on their pending motions *in limine*. Plaintiffs also designate all data produced by each of the Track 1 Defendants which is being relied on by Plaintiffs' experts.

Ex.	Prod. No.	Date	Description	Objections
1		6/20/03	Memorandum of Plea Agreement in <i>United States v. AstraZeneca Pharmaceuticals, LP</i> , Criminal Action No. 03-55 (D. Del.)	
2			Information filed by the U.S. Attorney in <i>United States v. AstraZeneca Pharmaceuticals, LP</i> , Criminal Action No. 03-55 (D. Del.)	
3		6/20/03	Transcript of the Plea and Sentencing Hearing before Honorable Joseph J. Farnan in <i>United States v. AstraZeneca Pharmaceuticals, LP</i> , Criminal Action No. 03-55 (D. Del.)	
4	BERKMAN 0204-05	5/19/03	Information filed by the U.S. Attorney in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	

⁵ In connection with its recent deposition of Harvey Weintraub, Schering dumped over a million documents on Plaintiffs' counsel. Mr. Weintraub's deposition was conducted on September 18-22, 2006. Due to the lateness of this material, Plaintiffs reserve the right to designate exhibits from this production. Some of this material was in fact not provided by Schering in the AWP case. Plaintiffs also reserve the right to designate documents from the documents to be produced by Schering-Plough pursuant to the Court's recent Order.

Ex.	Prod. No.	Date	Description	Objections
5		7/17/03	Transcript of the Plea Hearing conducted by Honorable Joseph J. Farnan, Jr. in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	
6		4/19/04	Examples of Zoladex labels presented as Exhibits at the Ohio State Licensing Board Hearing for Robert A. Berkman, M.D.	
7		9/18/04	Information filed by the U.S. Attorney in <i>United States v. Saad Antoun, M.D.</i> , Criminal Action No. 02-13 (D. Del.)	
8		9/18/02	Memorandum of Plea Agreement in <i>United States v. Saad Antoun, M.D.</i> , Criminal Action No. 02-13 (D. Del.)	
9	BERKMAN 0212-21	5/16/03	Memorandum and Pleas Agreement in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	
10	HOPKINS 0122-25	9/18/02	Superseding Information filed by the U.S. Attorney in <i>United States v. Stanley C. Hopkins, M.D.</i> , Criminal Action No. 02-127 (D. Del.)	

Ex.	Prod. No.	Date	Description	Objections
11		12/17/02	Memorandum and Pleas Agreement in <i>United States v. Stanley C. Hopkins, M.D.</i> , Criminal Action No. 02-127 (D. Del.)	
12		11/6/03	Transcript of Sentencing Hearing in <i>United States v. Robert A. Berkman, M.D.</i> , Criminal Action No. 03-45 (D. Del.)	
13		2/5/04	Letter from Judge Joseph J. Farnan, Jr. to the State Medical Board of Ohio	
14	AZ0237142-163	11/3/95	Memorandum from Market Strategy & Contract Operations and the Zoladex Marketing Team	
15	AZ0431807-811	10/19/00	E-mail from Margaret Hammons to George Gerhart III	
16	AZ0427821-858	3/8/99	Letter from Jacqueline Connelly to Howard Kaplan	
17	AZ0465663-665	11/30/01	E-mail exchange re: Drug Topics Red Book and PDR.	
18	AZ0449165-167	6/26/01	E-mail from John Freeberry to Rick Bartels	
19	AZ0021762-765	1/23/96	Internal memorandum from Keith Patterson to Chris Iacono	
20	AZ0237142-163	11/3/95	Memorandum from Market Strategy & Contract Operations Zoladex Marketing Team to Chris Iacono.	
21	AZ0435309-316		Document titled "Implementation of Catalog Price Changes"	

Ex.	Prod. No.	Date	Description	Objections
22	FDB-AWP-16989-996	7/2/01	Fax to First Data Bank from Sandra Bell	
23	AZ0449541-545	5/9/00	E-mail from John Freeberry to Richard Hedinger	
24	AZ0435202-212	5/15/01	Fax from Judy Roberts to Carol Flanagan	
25	AZ0435213-214	5/18/01	Fax to First Data Bank attaching AstraZeneca Revised Price List	
26	AZ0445417-424	8/22/00	E-mail from Barnabas Desta to Joan McDevitt	
27	AZ0080413-417	11/3/95	Memorandum from Market Strategy & Contract Operations to Chris Iacono re: Zoladex Pricing and Volume Discount Strategy	
28	AZ0036643	4/22/96	Memorandum from Paula Jordon to Fred Roberts re: Zoladex (goserlin acetate) Projects	
29	AZ0036585	1/29/96	Letter from Paula Jordon.	
30	AZ0465663-665	11/30/01	E-mail from John Freeberry to Mark Boyer	
31	AZ0473119	11/27/02	E-mail from Janet Rosenberg to Traci Kellam	
32	AZ0433750-756	2/27/02	E-mail from Monique Loeffert to Debra Ann Ivey	
33	AZ0437459-460	1/3/99	E-mail from Barbara Villani to Joseph Mansfield	
34	AZ0426708, 0426710-13	7/14/97	E-mail from Kaylor Kowash to Rickards, Arenson and Caswell	
35	AZ0037022		Handwritten Note	

Ex.	Prod. No.	Date	Description	Objections
36	AZ0017129	7/26/96	Memorandum from MRP to Zeneca File re: Conversation with Mark Reisenauer 7/19/96	
37	AZ0036510-33	6/00/95	Document titled "Zoladex Reimbursement Hotline Activity Report – June 1, 1995 – June 30, 1995" prepared for Zeneca Pharmaceuticals by State & Federal Associates Inc.	
38	AZ0105879-881		Letter from Chris Bowman to Members of the "Maricopa Urology Lithotripsy Inc." Group	
39	AZ0096359		Letter from Chris Bowman to Sheila	
40	AZ0464087	9/13/00	E-mail from John Freeberry to Julie-Ann Tracy	
41	AZ0445640-641	6/29/01	E-mail from Barnabas Desta to David Meddis	
42	AZ0407062-065	00/00/02	Sales Representative	
43	AZ0431262-71		AstraZeneca Pharmaceuticals Agreement	
44	AZ0237164-69	11/20/95	Internal Memorandum to Chris Iacono from Keith Patterson	
45	AZ0024479-81	1/19/96	Internal Memorandum to Chris Iacono from Keith Patterson	
46	AZ0011640	9/10/96	September 10, 1996 letter from M. Painter to M. Reisenauer	
47	AZ0011635-36	4/28/97	Letter from M. Painter to T. Arenson	

Ex.	Prod. No.	Date	Description	Objections
48	PXL01258-66	8/6/96	Fax from C. Ware to M. Reisenauer	
49	HOWE0052-57		Patient Financial History Prepare by Oregon Urology Specialists	
50	HOWE0120		Billing Statement to Mr. Howe	
51	HOWE0020-21		Medicare Summary Notice	
52	HOWE0010		Cancelled Check #3995 for \$118.81 Made Out to Oregon Urology Specialists	
53	TOWN500-503		Patient Financial History Report	
54	TOWN0001-2		Cancelled Checks Made Payable to Mr. Townsend's Urologist, Dr. E. Richard Grieco	
55	TOWN 0056		Medicare Summary Notice	
56	AZ0702243-46	10/16/04	Email of Erik Schultz	
57	AZ 0044059-63	10/13/95	Letter to Mark J. Harberberger from William C. Lucas	
58	ABT 48686-96	12/18/95	Letter from Mark J. Harberberger to William C. Lucas	
59	ABT 48560-76	9/26/95	Letter from Mark J. Harberberger at Abbott to Glenn M. Engleman at AstraZeneca	
60		6/4/03	Corporate Integrity Agreement between AstraZeneca and the Office of Inspector General of the Department of Health & Human Services, signed by AstraZeneca	

Ex.	Prod. No.	Date	Description	Objections
61	AZ0491331-43	2/10/03	CMS Account Team Kickoff Meeting	
62	AZ0037011	4/12/95	Internal Memorandum from Ruth Beedle re: Zoladex Profitability	
63	AZ0037036-48	9/5/95	Internal Memorandum from Tom Chen to Mike Bonney re: Zoladex Sample Inventories	
64	AZ0010307-09	4/6/96	Memorandum to Keith Patterson from Tom Chen re: TAP Response to Zoladex Case Quantity Discount	
65	AZ0036661	5/7/96	Memorandum to Mark Reisenauer, Tom Chen from Paula Jordon re: Payer Education Mailings	
66	AZ0577665-71	6/24/99	Cost and Suggested List	
67	AZ0431261-71	6/24/02	Email from Nancy Jones to Holle Terkhorn re: Annual Buy Group Zoladex Contract Template	
68	AZ0461415-65	6/2/00	Urology Portfolio Strategic Plan – TALT Update	
69	AZ0004616-38		Zoladex Strategic Summary – 1998-2002 by Keith Patterson	
70	AZ0682890-907	00/00/03	Zoladex 2003 EFAR Forecast	
71	AZ0689131-37	12/22/03	Email from Kathryn Jones re: Data to Support Additional Payment for Part B Drugs in 2004	
72	AZ0463635-38	1/23/02	Email from John Freeberry to Ena West & Erik Schultz re: Pricing New Specs	

Ex.	Prod. No.	Date	Description	Objections
73	AZ0464456	1/00/02	Pricing News	
74	AZ0707711-34		Zoladex Market Pricing	
75	AZ0462355-56	4/4/00	Email from Joan McDevitt re: Revised AZ Competitors Report	
76	AZ0461108-10	10/17/02	Email from Erik Schultz to John Freeberry re: AWP White	
77	AZ0005740-41	8/21/96	Internal Memorandum from Mark Reisenauer to Steve Strand re: Zoladex Pricing Recommendations	
78	AZ0013233-35	10/24/96	Internal Memorandum from Mark Reisenauer to Keith Patterson and Steve Strand re: Zoladex Price Increase Recommendation	
79		11/20/95	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing Strategy	
80	AZ0438395-97	1/06/00	Email to JoAnn Smith from Charles Dadonna	
81	AZ0437058-60		LHRH Cost Comparison	
82	AZ0437062		Patient on 4 10.8mg Injections	
83	AZ0422502-13	4/30/97	Internal Memorandum from Product Management Team for Zoladex to Oncology Care Representatives & Area Business Specialists re: New Options for Credit Card Payments for Zoladex	

Ex.	Prod. No.	Date	Description	Objections
84	AZ0422517-18	7/28/99	Corporate or Business Structure Questionnaire	
85	AZ0422520		History of Zoladex Pricing	
86	AZ0422592		Comparison of 25 Patients on 3 Month Zoladex Therapy for 1 Year vs. 4 Month Lupron Therapy for 1 Year	
87	AZ0422630-39	06/00/01	AstraZeneca Pharmaceuticals LP – Integrated Health Systems – Zoladex (goserelin acetate implant)	
88	AZ0424228		Comparison of 116 Patients on 3 Month Zoladex Therapy for 1 Year vs. 4 month Lupron Therapy for 1 Year	
89	AZ0431034-65	3/4/02	Email from Nancy Jones to Eugenia Glessner re: Lakes Region General Hospital and ST. Mary's Regional Medical Center IHS contracts	
90	AZ0431073	1/12/99	Draft Letter to Physician from Kulda & Heisey re: Zoladex Price Increase	
91	AZ0694210-65	04/00/03	Office of Inspector General – Compliance Program Guidance for Pharmaceutical Manufacturers	
92	PTX01034	1/19/95	Letter to Enid Olayan from Carol Ware	

Ex.	Prod. No.	Date	Description	Objections
93	PXL05552-602	8/20/93	Letter to Keith Patterson from Carol Ware enclosing report on Zoladex calls	
94	PXL05638-991	2/23/94	Letter to Keith Patterson from Carol Ware enclosing report on Zoladex calls	
95	PXL06067-594	2/23/96	Letter to Keith Patterson from Carol Ware enclosing report on Zoladex injuries	
96	PXL01037	1/20/95	Fax from Carol Ware to Medicare Part B Carrier	
97	AZ0036923-26	6/14/96	Memo to Mike Murray from Carol Ware re: CIGNA Medicare Bulletin	
98	AZ0021569-71	6/17/96	Fax to Keith Patterson & Mark Reisenaur from Carol Ware re: Colorado Medicare Part B	
99	PXL01803-04	2/29/96	Letter to Carol Ware from Sue Walker	
100	PXL03970-76	10/14/98	Total Proposals Pending	
101			Zoladex Label	
102			Zoladex Labeling	
103		4/18/97	Handwritten Agreement	
104			Lupron Depot 4-Month (30mg) Advantages	
105		1/29/96	Zoladex Cost Comparison	
106		4/10/98	Letter to Annual Contract Customer from Kathleen Sailer & Earl Heisey	
107			Zoladex Annual Contract	
108			Invoice	

Ex.	Prod. No.	Date	Description	Objections
109	AZ0487753-56	2/1/93	Suggested List Prices and Marketing Policy	
110	AZ0427978-85	6/2/98	U.S. Wholesale Druggists Cost and Suggest List Prices	
111	AZ0018042-44	11/4/96	Internal Memorandum from Mark Reisenauer to Bob Black & Jim O'Shea re: Zoladex Price Increase Recommendation	
112	AZ0096314		1-Month Depot Zoladex	
113	AZ0096386-88	9/26/95	Memo to Gary Hansen from Chris Bowman re: NSS- "Purchase Groups"	
114	AZ0096255-59	8/29/97	Email from Christopher Bowman re: Updated "Cheat Sheets"	
115	AZ0096293		Draft Letter to Ben from Chris Bowman	
116	AZ0428238-62		Zoladex Strategic Summary 1997-2001 prepared by Keith Patterson	
117	AZ0004734-55	4/20/95	Zoladex Strategic Plan 1996-2000 – Draft #1 by Keith Patterson	
118	AZ0010334-37	1/12/95	Memorandum to Chris Iacono from Keith Patterson re: Zoladex Pricing Strategy	
119	AZ0010297-302	3/1/95	Memorandum to William Simpson from Keith Patterson re: Zoladex Pricing	
120	AZ0029298-99		Handwritten Notes	

Ex.	Prod. No.	Date	Description	Objections
121	AZ0043915-95	11/3/95	Draft Memorandum to Chris Iacono from Market Strategy & Contract Operations re: Zoladex Pricing and Volume Discount Pricing	
122	AZ0017849-51	10/24/96	Internal Memorandum from Mark Reisenauer to Keith Patterson & Steve Strand re: Zoladex Price Increase Recommendation	
123	PXL 06595-661	12/27/96	Letter to Keith Patterson from Sean Coakley & Stephanie Wagoner	
124	PXL01040	2/15/95	Letter to Travelers Railroad Medicare from Sean Coakley	
125	PXL01045	2/23/95	Letter to Ms. Rita Crook, North Carolina Medicare Part B from Sean Coakley	
126	PXL01111-13	5/2/96	FOIA request to Kelly Gross, Blue Shield of California from Sean Coakley	
127	PXL01116	5/14/96	Letter to Medicare Part B Claims Review from Sean Coakley	
128	PXL01731-34	7/9/96	Letter to Laura Brooks from Sean Coakley re: Pricing for Zoladex 3.6 mg (goserelin acetate implant) – HCPS J9202	
129	PXL01702-11	8/8/96	Letter to Irene Michel, Minnesota Medicare Part B from Sean Coakley	

Ex.	Prod. No.	Date	Description	Objections
130	PXL06662-725 PXL04626-96 PXL04697-763 PXL04764-824 PXL04825-90 PXL04891-949 PXL04950-5003 PXL05004-65 PXL05117-69 PXL07273-334 PXL05232-328		Reimbursement Hotline Monthly Reports Prepared by Parexel for 1997	
131	AZ0419345-48		Medicare Review	
132	AZ021838	10/12/95	Internal Memorandum from Thomas Chen to Keith Patterson re: Price Increase for Zoladex	
133	AZ0080407-11	11/20/95	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing	
134	AZ0376204-17		AstraZeneca Urology Representative Training	
135	AZ0565611-14	1/30/02	Email to David Brennan & John Freeberry from Rachel Bloom-Baglin re: AWP Spread "White Paper"	
136	AZ0096241-42	12/5/97	Email from John Armstrong re: Zoladex Spreadsheet	
137	AZ0413687-91	3/7/02	Fax to Soleil Chavoshi from John Armstrong re: Competitive Pricing	
138	AZ0423944-50		LHRH Cost Comparison	
139	AZ0432026-34	3/13/01	Email from John Freeberry re: Change in AWP Spread	

Ex.	Prod. No.	Date	Description	Objections
140	AZ0449836-50	8/9/00	Email from John Freeberry to Joan McDevitt Re: Redbook	
141	AZ0438780-81	1/17/00	Email from Kenneth Smith re: Comparison of 3 month Zoladex & 3 month Lupron (New AWP & Pricing)	
142	AZ0016060-74		Proposed Zoladex Contracting Strategy	
143	AZ0044002-13	1/26/96	Zoladex 3-Month 10.8mg Depot Pricing Proposal	
144	AZ0024179-90	00/00/95	Zoladex Prostate Cancer 1995 Operational Plan	
145	AZ0021833	11/14/95	Internal Memorandum to Keith Patterson from Chris Iacono re: Zoladex	
146	AZ0040464	11/4/97	Internal Memorandum to C. J. Iacono from M. L. Rickards re: 1998 Pricing Recommendations – Prostate Cancer Portfolio	
147	AZ0000134-43		Zoladex Strategic Plan 1993-1997	
148	AZ0097294-95	6/24/97	Email from John Armstrong to Timothy Arenson re: 1998 Price Positioning	
149	AZ0095847-53	11/5/97	Email from John Armstrong to Jean Ludwig, Kenneth Smith and John Wawrzonek re: Zoladex vs. Lupron Cost & Profit Comparison	

Ex.	Prod. No.	Date	Description	Objections
150	AZ0424496-98	3/27/98	Internal Memorandum from Sales & Marketing Management Team for Zoladex & Casodex re: Competitive Pricing for Flutamide and Leuprolide	
151	AZ0044713-14	11/3/97	Email from Dean McAlister to Timothy Arenson re: Response: ZOLPRICE93.xls	
152	AZ0438474-76	2/15/01	Email from Jeffrey McVey to Ronald Danhoffer re: Highmark Lupon/Zoladex Letter	
153			Call Notes	
154	AZ0010394-99	3/3/94	Memorandum from Keith Patterson to W.J. O'Shea re: Zoladex Quantity Discount Recommendations	
155	PXL03686-715		Guide to Coverage and Reimbursement	
156	AZ0000062-85	6/21/94	Draft #1 Zoladex Strategic Plan 1995-1999	
157	AZ0427246-65	7/7/97	Proposed Zoladex Contracting Strategy	
158	AZ0032538-43	2/17/95	Memorandum to William Simpson from Keith Patterson re: Zoladex Pricing	
159	PXL02766-812		Zoladex Coverage & Reimbursement Physician's Office Guide	
160	AZ0428327-50		Zoladex Strategic Summary 1998-2002	

Ex.	Prod. No.	Date	Description	Objections
161	AZ0017131-36	1/23/96	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing Recommendations	
162	AZ0021679-81	12/2/96	Internal Memorandum from Mark Reisenauer re: Zoladex Price Increase	
163	AZ0022136-46	2/00/96	US Business Review – February 1996 – Zoladex prepare by Keith Patterson	
164	PXL00095-96	7/17/96	Memo to Keith Patterson, Mark Reisenauer, Tom Chen from Howard Tag re: Medicare Reimbursement	
165	AZ0010338-39	1/19/95	Internal Memorandum from Keith Patterson to Chris Iacono re: Zoladex Pricing	
166	AZ0715813-943		Price Analysis	
167	AZ0463627-29	1/28/02	Email from Jill Krating to Erik Schultz re: NEW PDF of Pricing News	
168	AZ0464857-59	3/1/02	Email from Erik Schultz to Jill Krasting re: AWP Spread	
169	AZ0373269	3/17/97	Fax to Frederick Hollon, M.D. from Jack Wawrzonek	
170	AZ0096737-38	12/1/97	Fax to Jeffrey Frankel, M.D. from Jack Wawrzonek re: Zeneca Annual Zoladex Contract	
171	AZ0094769	9/5/97	Email from Cathy Chakos to Kenneth Smith & John Wawrzonek re: Fay Alliance	

Ex.	Prod. No.	Date	Description	Objections
172	AZ0437244-47	3/30/99	Email from John Wawrzonek to Todd Orsi re: Annual Contract	
173	AZ0373195		AstraZeneca Code of Conduct (CD)	
174			Video Deposition of Dr. Robert A. Berkman	
174A		2/14/06	Video Deposition of David Brennan	
175		4/4/06	Amended Version of AstraZeneca Pharmaceuticals LP's and Zeneca, Inc.'s Responses to Plaintiff's Interrogatories and Requests for Admission in Montana	
176		4/9/04	Answer of Bristol-Myers Squibb Company, Oncology Therapeutics Network Corporation and Apothecan, Inc. to Plaintiffs' Amended Master Consolidated Class Action Complaint (Excerpts Only)	
177		7/26/04	Defendant BMS's Responses to Plaintiffs' Interrogatories to the Fast Track Defendants	

Ex.	Prod. No.	Date	Description	Objections
178		1/19/04	Responses and Objections of Defendants Bristol-Myers Squibb Company, Oncology Therapeutics Network Corporation and Apothecan, Incorporated to Plaintiffs' Request for Production of Documents and Interrogatories (Excerpts Only)	
179	BMS/AWP/000092170-86; BMS/AWP/0000468-77; BMS/AWP/0005335-51; BMS/AWP/0030828-42; BMSAWP/0017275-78; BMS/AWP/000092406; BMS/AWP/01071969-70 BMS/AWP/0030824-25	Various Dates	Composite exhibit of various letters to publishers from BMS	
180	BMS/AWP/000186646-49	8/22/95	Price Increase/Decrease Notification Process	
181	BMSAWP/0005609-22		Red Book Product Listing Verification	
182	BMSAWP0005571-608		Red Book Product Listing Verification	
183	BMSAWP0011245-48		Letters from Kaszuba to publishers changing markup factor	
184		9/18/04	Affidavit of Denise M. Kaszuba	
185	BMS/AWP/0041865-69	5/28/93	Memo from S. Tarriff to "List" re: List Price Increase Oral Antibiotics	
186	BMS/AWP/000275052-59		Glucophage XR Price Increase	
187	BMS/AWP/01109780-84	4/22/02	Email from Greg Fersko to various attaching Powerpoint slides	
188	BMS/AWP/00337637-41		Pricing procedures	

Ex.	Prod. No.	Date	Description	Objections
189	BMS/AWP/01088203-11	4/30/02	Email from Leigh Anne Leas to various attaching Powerpoint slides	
190	BMS/AWP/01112957-82; BMS/AWP/01190197-222; BMS/AWP/01071974-2011		Composite exhibit of three Internal Price Lists	
191	BMSAWP/0011361-67		Pocket Reference Price List	
192	BMSAWP/0028888-87 (May/June 1994) BMSAWP/0028868-79 (November/December 1994) BMS/AWP/000095588-611 (January/February 1997) BMS/AWP/000095612-23 (March/April 1997) BMS/AWP/000095624-35 (May/June 1997) BMS/AWP/000095636-47 (July/August 1997) BMS/AWP/000095648-63 (September/October 1997) BMS/AWP/000095559-900 (January/February 1998) BMS/AWP/000095901-16 (March/April 1998) BMS/AWP/000095664-79 (May/June 1998) BMS/AWP/000095804-19 (September/October 1998) BMS/AWP/000095820-36 (November/December 1998) BMS/AWP/000095699-714 (March/April 1999) BMS/AWP/000095715-30 (May/June 1999) BMS/AWP/000095731-46 (September/October 1999) BMS/AWP/000095766-83 (November/December 1999) BMS/AWP/000095747-65 (April 2000) BMS/AWP/000095784-803 (May 2000)		Composite exhibit of issues of OTN <i>The Network News</i>	

Ex.	Prod. No.	Date	Description	Objections
	BMS/AWP/000095861-84 (August 2000) BMS/AWP/000095837-60 (October 2000)			
193	BMS/AWP/001486072-73, 001486090		OTN AWP Price Report	
194	BMS/AWP/000469286-99		Executive Summary	
195	BMS/AWP/01327211		AWP (Ain't What's Paid)	
196	BMS/AWP/01088191-202		Understanding AWPs	
197	BMS/AWP/000096632-43	7/11/00	Reimbursement in Office Based Oncology	
198	BMS/AWP/000393437-464		Reimbursement	
199	BMS/AWP/000096900-12	4/6/00	Memo from Barbara Nathan to John Akscin, among others	
200	BMS/AWP/000094558-603		BMS Portfolio Marketing Strategy Marketing Choices	
201	BMS/AWP/000153461	12/5/97	Memorandum from Ron Miller to Mark Durand re: Oncology Policy Issues,	
202	BMS/AWP/000071159-62	1/10/03	Email from Barnard to various	
203	BMS/AWP/000056970-70150		Taxol contract sales	
204	BMS/AWP/000096291-300	3/19/03	Oncology Customer Contract Proposal and Consorta contract pricing	
205	BMS/AWP/000096333-45	1/16/03	Oncology Customer Contract Proposal and Owen contract pricing	
206	BMS/AWP/00979750-803	1/17/03	Email from Barnard with Premier contract pricing	
207	BMS/AWP/01124131-56	3/16/03	Email from Barnard with MHA contract pricing	
208	BMSAWP/0011214-35		Etopophos Launch Plan	
209	BMSAWP/0000597-617; BMSAWP/0000647-51		Various Kaszuba letters and memos	

Ex.	Prod. No.	Date	Description	Objections
210	BMSAWP/0000574-87		Albuterol pricing	
211	BMSAWP/0000095-120		Trimox pricing	
212	BMS/AWP/000217841-51	1/19/02	Marre email with Premier and Duke contract pricing	
213	BMS/AWP/000212669-74		Blenoxane contract sales	
214	BMS/AWP/01123962-74	3/5/03	Mayank email with VePesid analysis	
215	BMS/AWP/000071256-72		Christof Marre, "Taxol Generic Strategy Learnings from the U.S.	
216	BMS/AWP/01190031-55	4/7/02	Sippel email attaching Taxol Opportunity Plan	
217	BMS/AWP/001501681	8/22/01	Email from Sandy McMahon re: Taxol Questions	
218	BMS/AWP/00478735-74		Livin Beat – Customer Marketing	
219	BMS/AWP/000097131-37, at 000097134-36		OTN Cost Differential Report	
220	BMS/AWP/000096965-85		BMS Overview: Values Unique to POHMS	
221	BMS/AWP/000157423-35		Taxane Economics: Effect of Dose and Schedule	
222	BMS/AWP/001502304-38		Practice Efficiencies & Quality Care Workshop – Of Special Interest To: Physicians, Nurses, Office Managers, Billers	
223	BMS/AWP/000192875-76	1/30/01	Email from Janine Suscewicz transmitting Jan 26 Memo and accompanying BMS interrogatory responses to which the documents were attached	

Ex.	Prod. No.	Date	Description	Objections
224	BMS/AWP/001491629-32 Soule Dep. Ex. 8 BMS/AWP/001494633 BMS/AWP/001491634 BMS/AWP/001491635 BMS/AWP/001491378-80		Composite exhibit of Soule spread marketing documents	
225	BMS/AWP/001508047-61 BMS/AWP/001508114-17		Composite exhibit of Davidson spread marketing docs	
226	BMS/AWP/01233083-184	3/18/03	Greg Bell/Charles River Associates email attaching docs including Paraplatin Deconversion Powerpoint	
227	BMSAWP/0028479-86	1/1/95	BMS-OTN sales agent agreement	
228	BMS/AWP/001483218-27	4/22/03	Marsha Peterson email and business plan	
229	BMS/AWP/01403078 BMS/AWP/01406365 BMS/AWP/01404191 BMS/AWP/01404200 BMS/AWP/01404123 BMS/AWP/01408993 BMS/AWP/01408985 BMS/AWP/01402293 BMS/AWP/01409167 BMS/AWP/01402215 BMS/AWP/01418108 BMS/AWP/01418525 BMS/AWP/01418664 BMS/AWP/01418692 BMS/AWP/01418646 BMS/AWP/01414388 BMS/AWP/01415895 BMS/AWP/01414599 BMS/AWP/01414604 BMS/AWP/01414608 BMS/AWP/01402192 BMS/AWP/01402277 BMS/AWP/01415362		Composite exhibit of call notes	

Ex.	Prod. No.	Date	Description	Objections
	BMS/AWP/01421942 BMS/AWP/01423009 BMS/AWP/01403078 BMS/AWP/01421479 BMS/AWP/01420643 BMS/AWP/01402251 BMS/AWP/01414566 BMS/AWP/01426459 BMS/AWP/01406236 BMS/AWP/01407052 BMS/AWP/01403600 BMS/AWP/001491764-68 BMS/AWP/001491769-71 BMS/AWP/001491859-63 BMS/AWP/001491646			
230	BMS/AWP/000056952-69	11/1/02	Pricing & Institutional Operations Overview	
231	BMS/AWP/001502339	3/4/02	Memo from Denning to Keighley	
232	BMS/AWP/000956887, BMS/AWP/000083788-839	2/4/03	Akscin email attaching "Law & Order: OBO" PowerPoint	
233	BMSAWP/0005551-70	3/4/94	Fax from MediSpan with AWPs	
234	BMS/AWP/000217958-90		OBO Opportunities	
235	MDL-OBI00007628	12/7/00	Letter from Robert Savage re: Correspondence from Pete Stark	
236	MDL-OBI00040389-90	08/00/00	Email from Catherine Piech re: Amgen AWP Spread Change to 25%	
237	WKH77797-801	2/13/97	Price Change Notifications	
238	WKH 02434-438	1/6/98	Urgent – Price Change Information	
239	WKH 02446-447	1/7/00	Price Change	
240	MDL-OMP0049798		Ortho Biotech Inc. Pricing Strategy	
241			Contracting Initiatives	
242	MDL-OBI00058888-923		1998 Reimbursement Update and Challenges	

Ex.	Prod. No.	Date	Description	Objections
243	MDL-OBI00006641-98	6/21/99	Document titled "Shaping the Reimbursement Environment for Procrit: Ortho-Biotech, Inc. Discussion Document June 21, 1999"	
244	MDL-OBI00008374-75	11/7/00	Memorandum from John Dempsey to Gary Reedy and Bill Pearson re: Price Increase	
245	MDL-OBI00063643		Physician Economic Impact: Procrit vs. Transfusions RED ALERT	
246	MDL-OBI00012158		Oncology Franchise Objections & Responses	
247	MDL-OBI0005413-15		POA 3 District Manager Pre-Work	
248			Charts regarding Procrit	
249	MDL-CEN00002717-878	3/25/98	Remicade cA2 Marketing Plan U.S. Crohn's Indication Launch	
250	WKH 01029	9/1/98	Letter Ron Krawczyk to Kathy Gutegesell at FirstData Bank	
251	MDL-CEN00021066	4/3/01	Email from Joseph Scodari to Dave Holbeck re: AWP Issue-Discussion with Shannon Salmon	
252	MDL-CEN00003478-500		Remicade Office Based Infusion Guide	
253	MDL-CEN00003607-73	00/00/00	Practice Management Program for Remicade	

Ex.	Prod. No.	Date	Description	Objections
254	MDL-CEN00090285-302	12/18/03	Powerpoint titled "Local Payer Information" Laura Glassco- National Account Manager, Ken Wegner-Regional Account Manager; Centocor, Inc.	
255	MDL-OBI00054909-13	6/15/92	Pharmaceutical Sales Agreement with Caremark	
256	MDL-OBI00055078-82	1/7/93	Pharmaceutical Sales Agreement with Stadtlanders	
257	TAP GB 08146	6/8/94	Memorandum to Alan MacKenzie re: Medicare Proposal	
258	DD 0081-82	6/21/95	Memorandum to Don Patton from Alan MacKenzie re: Meeting with Ann Vickery of Hogan and Hartson	
259	MDL-OBI00058842-44	1/7/98	Email from Cathleen Dooley	
260	MDL-CEN000085404-05	7/6/99	Memorandum from Centocor's Michael Ziskind to Jason Rubin	
261	MDL-CEN00108051-54	11/5/98	Letter to C. Klaye Riley from Valerie	
262	MDL-OBI00061052-053	12/2/97	Memorandum from C. Dooley to G. Reedy	
263	MDL-OMO0049638-39	12/3/97	Memorandum from Gary Reedy to Carol Webb	
264	MDL-CEN00071134		Computer Screen Printout	

Ex.	Prod. No.	Date	Description	Objections
265	MDL-OBI00030675-84	4/10/01	Letter to Alpine Hematology Oncology from Elaine King	
266	YOUNG0001-11; YOUNG0213-16		Monthly Checks Written by the Youngs and a Couple of Receipts	
267	YOUNG0054; YOUNG0052; YOUNG0035		Invoices showing Remicade Charges	
268	MDL-OBI00063656-57	7/10/96	Memorandum to Minneapolis District from John Hess	
269	MDL-OBI00063644-55	3/22/95	Bulletin No. 07 to Orlando District from David Rybak re: 1 st Quarter Successes and Team Experiences	
270	MDL-OBI00062507-661	12/1/92	From Mycrocytic Cells to Macrocytic Sales – Regional Training Workshop Materials held in Houston, Texas	
271	MDL-CEN000086707-777		“The Power Within” – Remicade Powerpoint	
272	MDL-CEN00090283-302	11/1/00	E-mail from Laura Glassco to Tom Weiss, et al. re Dr. Kassan with attached PowerPoint titled “Local Payer Information” Laura Glassco- National Account Manager, Ken Wegner-Regional Account Manager; Centocor, Inc.	
273	MDL-CEN00107360		PowerPoint – first slide titled “Topics”	

Ex.	Prod. No.	Date	Description	Objections
274	MDL-CEN00090081-84	8/20/99	Document titled "Cost Comparison of Anti-TNF Agents in Rheumatoid Arthritis Patients Receiving Methotrexate for Plan and Group Managers"	
275	MDL-CEN00071133-45	5/21/00	E-mail from Laura Glassco to Darla Ivey, et al. re Stuff with attached document titled: "Cost Comparison of Anti-TNF Agents in Rheumatoid Arthritis Patients Receiving Methotrexate for Plan and Group Managers" dated 8/20/99 and spreadsheets	
276	MDL-CEN00107382-83	1/00	Document titled "Practice Management Worksheet for Assessing New Services"	
277	MDL-CEN00107384	7/30/99	Document titled "Average Reimbursement for Remicade (infliximab) When Billed by a Physician's Practice"	
278	MDL-CEN00107385-89		Document titled "Breaking the Barriers: Essential Tools for Remicade Therapy"	

Ex.	Prod. No.	Date	Description	Objections
279	MDL-CEN00030466	3/16/98	Interoffice correspondence from Matthew J. Carpenter to J. McHugh and J. Kerrigan re: "Average Acquisition Price vs. Average Acquisition Price" with attached memo from Brian Fitzpatrick to Matt Carpenter re: "AWP vs. Acquisition Pricing" dated 3/13/98	
280	MDL-CEN00004003-08	11/18/98	Memo from John McDermott and Alex Shipman to Mary Fisher and Gary Conte re: "Additional Information on AWP Spread"	
281	MDL-CEN00103688-90	9/22/02	E-mail from Seth Fischer to Joseph Scodari, et al. re: "AWP Reporting issue: an overview"	
282	MDL-CEN00054641-43	5/3/02	E-mail from Michael Ziskind to John Hoffman re: "25% policy analysis1.xls – FINAL FINAL CORRECTION? Ignore prior emails" with attached spreadsheet	
283	MDL-CEN00004144-65	6/3/99	PowerPoint – "Presentation to Area Business Managers Mid-Year Recap and Strategy for REMICADE June 3, 1999 Mike Ziskind"	
284	MDL-CEN00103657		Document titled "Analysis of Costs for Office IV Administration"	

Ex.	Prod. No.	Date	Description	Objections
285	MDL-CEN00024708-09	8/20/99	Document titled "Cost Comparison of Anti-TNF Agents in Rheumatoid Arthritis Patients Receiving Methotrexate for Plan and Group Managers"	
286	MDL-CEN00010403	3/1/00	Letter from Mike Ziskind to Terri Factora	
287	MDL-CEN00004039-40	6/18/99	Letter from Mike Ziskind to Holli Marchino with fax cover	
288	MDL-CEN00044767-68	11/00	Letter from Michael Ziskind to Dear Healthcare Provider with attached "Payer Policy Update Questionnaire for REMICADE (infliximab)"	
289		2/15/00	Software and document titled "Remicade Practice Management Assistant"	
290	MDL-CEN00014840-63	1/00	Document titled "Managed Care Contracting Guide Integrating Infusion Therapies Into Your Practice"	
291	MDL-CEN00045582-85	4/3/02	E-mail from Karen Smith to Michael Ziskind re: "In response to your question"	
292	MDL-CEN00000450-57	5/18/01	Interoffice memo from Mike Ziskind to Scott Habig re "Pricing change scenario assessment"	

Ex.	Prod. No.	Date	Description	Objections
293	MDL-CEN00064895; MDL-CEN00064949-59	5/15/97	Cover sheet titled “cA2 Commercialization Strategy Plan” with attached PowerPoint titled “cA2 Commercialization Strategy cA2 Business Model”	
294	MDL-CEN00014746-66	3/6/00	Document titled “Remicade: Physician Practice Management Program”	
295	MDL-CEN00070430-31	6/13/01	Interoffice correspondence from Craig Fraser to Immunology Sales Force, et al. re: “Remicade 3.9% Price Increase”	
296	MDL-CEN00076465-67	6/26/01	E-mail from Julie McHugh to Mary Heino, et al.	
297	MDL-CEN00055412-22	7/1/01	Pharmaceutical Rebate Agreement Between Centocor and John Deere Heath Care, Inc.	
298	MDL-CEN00070384-89	7/11/00	E-mail from Stephen Jacobs to Sharon Hunt, et al. re Corporate Accounts SWAT presentation with attached Remicade slides	
299	MDL-CEN00082084-100		PowerPoint “Systems Cheryl Cohen Director of Corporate Accounts”	
300	MDL-CEN00080691-92	4/4/02	E-mail from Cheryl Cohen to Michael Ziskind, et al. re: “Thoughts re. Infusion rate strategy & tactics”	

Ex.	Prod. No.	Date	Description	Objections
301	MDL-CEN00036109-40	1/23/02	E-mail from Cheryl Cohen to Eric Mensh, et al. re "Presentation at our meeting Jan 31, 2002" with attached PowerPoint presentation	
302	MDL-CEN00032730-32	8/7/02	E-mail from Cheryl Cohen to Tom Weiss, et al. re "CIGNA & Aetna USHC Reimbursement Clarification"	
303	MDL-CEN00035294-310	8/8/02	E-mail from Cheryl Cohen to Tom Weiss re: "Business Plan" with attached PowerPoint "Remicade Corporate Accounts 2002 Business Plan"	
304	MDL-CEN00032733-35	8/7/02	E-mail from Cheryl Cohen to Tom Weiss re: "CIGNA & Aetna USHC Reimbursement Clarification"	
305	MDL-CEN00042083	6/14/01	E-mail from Kevin Renahan to Immuno_Sales with attached interoffice correspondence	
306	MDL-CEN00071150-55	6/22/01	Email from Pamela Carpenter re: Updated Worksheets	
307	MDL-CEN00000201 MDL-CEN00000407-08		Letters from Jim Binova re Price Increases for Remicade	
308	MDL-CEN00028226-28	2/14/01	Email from Eric Mensh re: Specialty Pharmacy Memo	
309	MDL-CEN00028221-25	4/30/01	Email from Jim Bivona to Tom Weiss re: Top Accounts	

Ex.	Prod. No.	Date	Description	Objections
310	MDL-CEN000085169-72		Powerpoint Slides – “Regional Account Manager Jim Bivona Centocor Immunology Business Unit – 2001 Business Plan”	
311	MDL-CEN00005773-827	00/00/02	Remicade Corporate Accounts – 2002 Business Plan – “Abbreviated”	
312	MDL-OBI00011641-58	00/00/98	Ortho Biotech Inc. – Strategic Customer Group 1998 Business Plan Overview	
313	MDL-OBI00007971-84	11/19/98	Strategic Customer Group – Integrated Business Plan 1999	
314	MDL-OBI00043203-14	9/28/99	Email from James Linzer to Cathleen re: ibpsc92899.ppt	
315	MDL-OBI00059302-05		Physician Medicare Reimbursement Scenarios	
316	MDL-OBI00003061-81	8/8/00	Integrated Business Plan 2001 – Strategic Customer Group	
317		6/00/02	2003 SCG Strategy Development – Strategic Accounts Department Plan	
318	MDL-OBI00003492	8/24/98	Email from Cathleen Dooley re: Follow-up of voice mail request	
319	MDL-OBI00026235-36	12/5/01	Email from Ken Nelson re: Avg. Selling Price/CIA Follow up	
320	MDL-OBI00054848-51	1/31/95	Pharmaceutical Sales Agreement – January 30, 1995	
321	MDL-OBI00055218-20	2/24/95	Pharmaceutical Sales Agreement – January 15, 1995	

Ex.	Prod. No.	Date	Description	Objections
322	MDL-OBI00029484-91	1/1/01	Rebate Agreement Between Dr. Schafer & Ortho Biotech	
323	MDL-OBI00052455-57	4/7/02	Email from Dick Robbins to John Dempsey re: Big Bet – Distribution	
324	MDL-CEN00013965	6/13/01	Ron Krawczyk of Centocor letter to Alisha Nielsen re announcing a 3.9% Price Increase for Remicade	
325	MDL-OBI00030677-684	3/9/01	Document titled Rebate Agreement Between Alpine Hematology Oncology and Ortho Biotech Production signed by Thomas C. Hiriak for Ortho	
326	JJ-001716-727	Undated	Document titled REMICADE RA Marketing Plan	
327	MDL-CEN00103686-687	9/20/02	Email from Diane Ortiz to David Sheffield, Alex Gorsky, John Szabo, Louise Mehrotra, Kathy Buto, Jerry Holleman re AWP Reporting issue: an overview	
328	MDL-CEN00054564-567	7/11/02	Email from Angel Ortiz, Jr., to Kathy Buto, Cathleen Dooley re ASP Charts with attachments with attachments (cc: Diane Ortiz, Doris Chern, Michele Murphy, Paul Denofio	

Ex.	Prod. No.	Date	Description	Objections
329	MDL-CEN00044499-504	6/6/01	Email from Rick Bierly to Tom Weiss, Kirk Barton, Ron Krawczyk, Julie McHugh, Scott Habig, Tony Vernon Dominic Caruso re (Updated) Remicade Price Increase Memo with attachments	
330		11/30/00	Letter to All Orth Biotech Employees transmitting the Ortho Biotech "Best Practice Guidelines"	
331	MDL-OBI00061831-41	10/3/97	Procrit Reimbursement Alternatives Presented by Documedics	
332	MDL-OBI00061346-526	10/23/97	JJHCS Regional Managed Care Training	
333	MDL-OBI00061692-93	11/6/97	Bulleting No. 17 to Orlando Team from Brian Butler re: President's Cup Strategy Meeting Recap	
334	MDL-OBI0006777-817	12/00/99	Strategies for Shaping the Reimbursement Environment	
335		4/28/06	Declaration of Mark E. Duxbury	
336			POA I Oncology Account Specific Contracting Pre-Work	
337	MDL-OBI00063552-56		Strategic Plan Worksheet	
338	MDL-OBI00052883-931	11/00/02	Current Strategies – Discussion Document	

Ex.	Prod. No.	Date	Description	Objections
339	MDL-OBI00061803-07	8/6/96	Memorandum from C. Dooley to T. Amick re: Reimbursement Considerations for Spillover Planning	
340	MDL-OBI00037345	3/28/97	Letter from Rick Heine to A. Sample, M.D.	
341	MDL-OMP0049464		Contract Terms Comparison Procrit vs Aranesp	
342	MDL-OBI00053911-75	6/12/02	Draft Procrit Contracting: Strategic Response to Aransesp – Working Session	
343	MDL-OBI00041457-79	9/18/02	Procrit Physician Office Strategy: Strategic Responses to Aranesp prepared by Charles River Associates	
344		8/5/02	Procrit Contracting: Modeling Provider Economics prepared by Charles River Associates	
345	MDL-OBI00059688-89	8/19/98	Physician Office Rebate Scenarios	
346	MDL-OBI00060859-64	2/8/99	Procrit Medicare Review prepared by Trinity Partners	
347	MDL-OBI00059329-41	12/15/98	Procrit Medicare Review prepared by Trinity Partners	
348	MDL-OBI00055929	8/10/00	Document titled Ortho Biotech Historical List Price Change Procrit	
349	MDL-OBI00038306	8/8/02	Document titled Ortho Biotech Products, L.P. Historical Pricing Actions	

Ex.	Prod. No.	Date	Description	Objections
350	MDL-OBI00015406	Undated	Chart titled Practice Economics – Detail of Calculations, List Price Changes, No Rebates	
351	MDL-OBI00038425-426	Undated	Document titled Buy/Bill Physicians and APC	
352	MDL-OBI00041480-482	Undated	Documents/charts titled Physician contracting current status, Managed Care Contracting, Managed Care Contracting	
353	MDL-OBI00055915-916	Undated	Document titled Ortho Biotech Products, L.P. Medicare Reimbursement Analysis re Procrit	
354	MDL-OBI00054076-081	Undated	Document titled Current 7% Total Rebate (5% physician rebate + 2% administration fee) Proposed Rebates	
355	MDL-OBI00015311-312	11/7/00	Memorandum from John Dempsey to Gary Reedy, Bill Pearson re Price Increase – PRO's & CON's	
356	MDL-OBI00060818-822	6/19/98	Memorandum from M. Reese to B. Pearson re Proposed Rebates	
357	MDL-OBI00003671-824	1/26/00	Ortho Biotech document titled Project PROBIT Final Report	
358	MDL-OBI00002833	Undated	Documents titled Ortho Biotech Products, L.P. – Price Increase/Change	

Ex.	Prod. No.	Date	Description	Objections
359	MDL-OBI0004515-517	8/16/99	Redbook document titled Product Listing Verification Medical Economics	
360	MDL-OBI00056534-35	11/13/00	Memo from First Data Bank to Martha Hull re products included in databank	
361	MDL-OBI0002835	9/01	Memo to All Wholesalers And Distributors re URGENT – PRICE CHANGE NOTIFICATION	
362	MDL-OBI00063642-643	Undated	Document titled Physician Economic Eimpact: Procrit vs. Transfusions	
363	MDL-OBI00058979-82	9/28/98	Document titled Objection Workshop	
364	MDL-OBI00059164	9/28/98	Letter from Brock Weathers to Michael Kalson of Academy Orthopaedics attached	
365	MDL-OBI00061785	4/3/97	Memorandum from M. Klein/ C. Dooley to S. Salmon	
366	MDL-OBI00063100	8/00	"POA3" Training (Video)	
367	MDL-OBI00054647		Procrit (Epotein alfa): The Strength of Experience	
368	MDL-OBI00054650		Maximum Value Programs for Preferred Physician Customers	

Ex.	Prod. No.	Date	Description	Objections
369			Maximum Value Programs for Preferred Hospital Customers	
369A ⁶	MDL-OBI00061025-26	2/19/97	Memorandum to S. Walden from C. Dooley re: Medicare AWP Drug Reimbursement Proposal	
369B	MDL-OBI00060823-58		1999 Rebate Recommendations	
369C	MDL-OBI00015367		OBI Gross/Net ASP List 1991-1998	
369D	MDL-OBI00040392-93	7/11/00	Memorandum from Bill Pearson re: Price Action Recommendations – 2000 - CONFIDENTIAL	
369E	MDL-OBI00057840-45	6/8/04	Email from Elaine Kling re: Ortho Biotech Price Action with Attachment	
369F	MDL-OBI00056537-38	9/7/01	Email Exchange re: Price Change Notification September 6, 2001	
369G	FDB-AWP035797-99	9/7/01	Drug Product First Databank Information Sheet; Fax to Kay Morgan from Elaine Kling	
369H	MDL-OBI00056533-35	11/17/00	Fax from Martha Hull to Kay Morgan re Price Increase for Full Line of Ortho Biotech products	
369I	MDL-OBI00002837	1/6/00	Price Change Notification sent by Elaine Kling	

⁶ In response to Johnson & Johnson's and Schering-Plough's disclosures, the Plaintiffs supplement with the following exhibits: 369A-369K.

Ex.	Prod. No.	Date	Description	Objections
369J	MDL-OBI00008666-67	1/6/98	Price Change Notification sent by Rick Heine	
369K	SP 0013866			
370	MDL-OBI00054659	2002	Procrit-CA-R 1.2CD- Rom: The Procrit vs. NESP Cost Analysis Presentation-R	
371	MDL-JJ0000060-61	9/20/06	Email from Diane Ortiz re: AWP Reporting Issue: An Overview	
372	MDL-CEN00064885-94	3/19/03	Memorandum to Christine Poon & Bill Weldon from Joe Scodari re: Centocor Price Recommendation – April 7, 2003	
373	MDL-CEN00069747-50	7/12/02	Email from Kathy Buto re: Updated Slides for July 16 Meeting	
374			NOT USED	
375	FDB-AWP 03929-932	12/3/01	Mailgram to Customer from Frank Dilascia	
376	WCT0023981			
377	WCT0012073	9/21/95	Letter to Bill Folk from Jerome Sherman	
378	SPF0057742		Letter from Frank Dilascia	
379	SW0173547	11/18/97	Letter from Harvey Weintraub to Jacob Blatt	
380	WAR0020649	10/9/98	Price Change	
381	SPF00013329-31	3/19/01	Email exchange between Olav Hellebo and Peter McCarthy	
382	SPF0116590-91	9/29/00	Email from Susan Lund to George Paliotto	
383	SPW0039329	12/11/95	Memorandum to R. Bucko from D. Reich re: Warrick Inhaler Invoicing	

Ex.	Prod. No.	Date	Description	Objections
384			Schering-Plough Annual Spreads 1991 to 2004 Q1	
385	SPF0115322-27	8/16/00	E-mail from Kathleen Taylor to Bonnie Zell	
386	SPF0114601-05	6/20/00	E-mail from Susan Lund to Patricia Grote re: Reimbursement Letter	
387	SPF0117637-38	11/3/00	E-mail from Tomas Manos to Cynthia McGuiness	
388	SPF0118419-26	1/4/01	E-mail from Denise Foy to Ray Russo re: Revised Q&A for Genentech Announcement	
389	SPF0105089-92	7/27/98	E-mail from Frances Deangelo-Lynch to Bruce Wallace re: Kaiser Files	
390	SPW0042546		Schering Integrilin Committed Member Program – Letter of Commitment	
391	SPF0119115-16	7/2/01	E-mail from Janice Brennan to Alberto Sanabria re: New Integrilin NDPs and AWPs	
392	SPF0113276-300		E-mail from Susan Lund to George Paliotto re: Current Reimbursement Status of 3b/3a Class	
393	SPF0074932-35	8/19/99	E-mail from Gary Galvan to Peter Kamins re: Temodar	
394	SPF0104510-12	2/2/98	E-mail from David Maya re: Intron 95% AWP Reimbursement for Bladder	

Ex.	Prod. No.	Date	Description	Objections
395	SPW0042545		Schering Intron Committed Member Program – Letter of Commitment	
396	WAR0006979-82		CVS Proposal	
397	SW0027026		Schering document titled “Cost Analysis for Superficial Bladder Cancer”	
398	Withdrawn	4/29/03	Letter to Michelle Sylvestre from B. Michael Kennedy re: Schering Corporation Pricing	
399	Withdrawn		Intron A for Superficial Bladder Carcinoma	
400	Withdrawn		Schering Laboratories Generic Strategy	
401	Withdrawn	4/3/03	Letter from B. Michael Kennedy to David Parella with Warrick Pharmaceuticals Pricing Update for the month ending 03/31/03	
402	Withdrawn	4/14/97	“Rider To Terms Of The Bid” between Warrick Pharmaceuticals and Jack Eckerd Corporation	
403	Withdrawn	11/11/00	Fax from Peter Kamins to Ina at First Databank with Western Union Mailgram from Frank J. Dilascia to Peter Kamins re: price increases	
404	Withdrawn		Document titled “Amerisource Income Rx and Select Market Share Programs”	

Ex.	Prod. No.	Date	Description	Objections
405	Withdrawn		Schering-Plough Organizational Chart	
406	Withdrawn	8/29/06	Press Release "Schering to Pay \$435 Million for The Improper Marketing of Drugs and Medicaid Fraud	
407	SW0638402-595	4/1/00	April 1, 2000 Schering-Plough International Organization Chart of employees	
408	WAR0005993-6097		Schering Laboratories Generic Strategy	
409	WAR0005957-77	4/21/93	Proventil Inhaler Generics Strategies	
410	SPW0039672-74	1/4/93	Schering Laboratories Memo from Eugene P. Desimone and Richard W. Zahn to Raul E. Cesan re: Strategic Issues	
411	Withdrawn	5/10/95	Schering Labs Managed Care Memo from Beth Voss to Betsy Chorpenning re: Proposal for Suncare, Warrick and Vancenase aerosol at DEMAC/SelectCare	
412	WCT0145536	6/13/00	Warrick Pharmaceuticals Memo from Harvey Weintraub to Raman Kapur re: Discontinuance of Private Label Product	
413	Withdrawn	2/6/01	Schering Laboratories Letter from Michael Marino to Don McGeorge and Mike Schlotman re: Return Policy	

Ex.	Prod. No.	Date	Description	Objections
414	Withdrawn	6/24/94	Revised Schering Laboratories Slides re: Proventil Inhaler	
415	SW0641705-06	3/23/99	Warrick Memo from Darren K. Willoughby to Raman Kapur re: Updated Managed Care Pricing	
416	SPW0039837-38		Integration of Warrick into Managed Care summary of review of mission and action plan	
417	SW00245127-30	10/20/99	Extraneous Costs Associated with Warrick Albuterol Discontinuation from Richard Zahn	
418	WCT0144924-28	3/29/94	Schering Managed Care Memo from David Lee to Scott Larson re: GeriMed Warrick Contract Proposal	
419	WAR0001661	12/7/95	Warrick Sales Meeting Agenda	
420	SW0647978-8033		Contracting Guide	
421	WCT0031786-90	8/9/93	Schering Laboratories Memo Harvey Weintraub to Richard Zahn re: Status Report – Warrick Pharmaceuticals	
422	WAR0043141-48; WAR0043124	2/2/95	Warrick Letter to Burt Orland Director of Pharmacy for Fallon re: contract price effective March 1, 1995 through December 31, 1995; and October 28, 1999 email from Patty Burke to Kathleen Flynn re: Fallon Clinic – Albuterol	

Ex.	Prod. No.	Date	Description	Objections
423	SW0425368-70	5/13/02	Email from Michael Flinn to Paul Ehrlich re: Impact of Changing Medicaid Basic Rebate Minimum with Schedule Attached	
424	WAR0054018; SPF0045824-26	2/8/99; 2/16/99	E-mail from Frank Finnie re: Albuterol Inhaler Back-Order Status; and E-mail Penny Malcolm to Rosanna Dooley re: CMOP Shipments for Proventil Inhalers	
425	WAR0006155-56	6/21/00	Letter from John F. Hoffman to L. Timothy Terry	
426	SPF0057682	1/8/02	E-mail from B. Michael Kennedy to John Vanschaften re: Price Reporting	
427	WCT0002622	12/29/95	Warrick letter from Phyllis T. Sinoradzki to Sharon Milton-Wilhelm re: Albuterol pricing	
428	WCT0012136	12/30/95	Warrick letter from Phyllis T. Sinoradzki to Elizabeth Geary re: Albuterol pricing	
429	WCT0011816	12/30/95	Warrick letter from Phyllis T. Sinoradzki to Martha McNeill re: Albuterol pricing	

Ex.	Prod. No.	Date	Description	Objections
430	WAR0001434-41	1/3/96	Schering-Plough Memo from Mark Calabrese, Carolyn Heinl Kocis and Kevin Cavanagh to Managed Care Directors and MCAMs re: Proventil Inhaler/Albuterol Generic Managed Care Action Plan	
431	WAR0022429	2/23/95	Warrick letter from Harvey J. Weintraub to Warrick Accounts re: Albuterol price increase	
432	WAR0029661	5/15/98	Schering-Plough Memo from B. Michael Kennedy to Raman Kapur re: Rite-Aid Chargeback Program	
433	WAR0015114; WAR0015071; WAR0015143-44; WAR0015167; WAR0015189-90; WAR0015009-10		Rite-Aid Corporation Secret Pricing	
434	WAR0007001-02		Rite-Aid Pricing	
435	WCT0145301-06	11/30/98	Warrick letter from Jerome A. Sherman to Irwin Wechsler re: ISMN tablet pricing	
436	WAR0025405	6/6/95	Warrick letter from Jerome A. Sherman to John Ziebell re: Inhalation Solution and Syrup	
437	WAR0021529-30	9/21/95	Warrick letter from Al Graf to John Ziebell re: Albuterol Price Increase	
438	WAR0021498	5/8/96	Memo from Patty Hiley to Yvonne Cagnina re: Walgreen Company Credit, Line Rebate 1st Quarter 1996	

Ex.	Prod. No.	Date	Description	Objections
439	WAR0025201	2/25/98	Letter Al Graf to John Ziebell re: Albuterol Price and Rebate Change	
440	WAR0020643	5/5/98	Warrick Promotion Agreement with Walgreen	
441	Withdrawn	5/7/98	Warrick memo Al Graf to Raman Kapur re: Walgreen's Free Goods	
442	WAR0025202	5/22/98	Letter Al Graf to John Ziebell re: Albuterol Price Change	
443	WAR0025195	10/9/98	Letter Al Graf to John Ziebell re: Albuterol Price Change	
444	WAR0025180	3/11/99	Letter Al Graf to John Ziebell re: Albuterol Price Change	
445	WAR0025174	9/22/99	Letter Al Graf to John Ziebell re: Albuterol Sulfate Price Change	
446	WAR0025170	11/11/99	Letter Al Graf to John Ziebell re: Albuterol Price Change	
447	WAR0016695	5/30/96	CVS/Warrick Inhaler Market Share Program	
448	Withdrawn	11/20/96	Fax Jerome Sherman to Jackie Mobley re: Market Share Program	
449	SPW0042103-04	1/29/97	Letter Penny Malcolm to Anthony Tavolaro re: Chargeback Rebate	
450	WAR0011799	2/18/97	Letter Jerome Sherman to Anthony Tavolaro re: Albuterol Sulfate Price Change	
451	WAR0011637-38	3/24/97	Letter Anthony Tavolaro to Jerome Sherman re: Generics	
452	WAR0011812	3/27/97	Letter Jerome Sherman to Anthony Tavolaro re: Albuterol Price Change	

Ex.	Prod. No.	Date	Description	Objections
453	SW0736211-17	6/10/97	Warrick Fax re: Total Line Rebate Program	
454	WAR0011811	9/9/97	Warrick letter Jerome Sherman to Anthony Tavolaro re: Albuterol Price Change	
455	WAR0011800	9/9/97	Warrick letter Jerome Sherman to Anthony Tavolaro re: Albuterol Sulfate Price Change	
456	SPW0042077-82	10/27/97	Warrick letter to Anthony Tavolaro re: Total Line Rebate Program	
457	WAR0006455-56	5/5/98	Warrick letter Jerome Sherman to Anthony Tavolaro re: Albuterol Price Change	
458	WAR0006449-50	10/16/98	Warrick letter Jerome Sherman to Kate Shattuck re: Albuterol Price and Rebate Change	
459	WAR0006451-52	10/28/98	Warrick letter Jerome Sherman to Kate Shattuck re: Albuterol Price and Rebate Change	
460	WAR0006431	1/18/99	Warrick letter Jerome Sherman to Matt Leonard re: Albuterol Price Change	
461	WAR0002533	4/12/99	Warrick Memo Jerome Sherman to Raman Kapur re: Rite Aid/CVS – Wholesaler Chargebacks	
462	WAR0020609-10	6/21/99	Warrick Fax to Matthew Leonard re: completely executed copy of the Total Line Rebate Agreement	

Ex.	Prod. No.	Date	Description	Objections
463	WAR0006424; WAR0006426	9/14/99	Warrick letter Jerome Sherman to Matt Leonard re: Albuterol Sulfate Price Change	
464	Withdrawn	9/14/99	Warrick Account Information Form for Price Change to CVS	
465	WAR0006353	3/22/00	Warrick letter Jerome Sherman to Matt Leonard re: Albuterol Price Change	
466	WAR0030708-11	11/30/00	Warrick letter to David Marshall re: Chargeback Rebate	
467	Withdrawn		CVS Proposal	
468	WAR0006336-37	7/5/00	Warrick Memo Jerome Sherman to Ruth Olivares re: CVS- Meeting Ethex Offer with Warrick Promotion Agreement	
469	WAR0037851-52	1/8/01	Warrick Promotion Agreement with Merck-Medco	
470	WAR0036807-09	1/16/96	Schering-Plough Fax Richard Zahn to Raman Kapur re: Medco Proposal	
471	WAR0001510-27		Schering/Warrick Albuterol Inhaler Action Plan, prepared by Steve Cooper and Mark Calabrese	
472	WCT0001032	1/4/95	Warrick Memo Steve Cooper to Raman Kapur re: Notes from Trade Sales/Warrick Staff Meeting	
473	SPW0039336	7/11/97	Schering Corporation Guarantees re: ANDA Generics	

Ex.	Prod. No.	Date	Description	Objections
474		3/15/93	Certificate of Incorporation of Warrick Pharmaceuticals Corporation issued by Delaware Secretary of State	
475		2/22/94	State of Delaware 1993 Annual Franchise Tax Report for Warrick	
476		2/23/95	State of Delaware 1994 Annual Franchise Tax Report for Warrick	
477		2/15/96	State of Delaware 1995 Annual Franchise Tax Report for Warrick	
478		2/21/97	State of Delaware 1996 Annual Franchise Tax Report for Warrick	
479		2/24/98	State of Delaware 1997 Annual Franchise Tax Report for Warrick	
480		2/17/99	State of Delaware 1998 Annual Franchise Tax Report for Warrick	
481		2/21/00	State of Delaware 1999 Annual Franchise Tax Report for Warrick	
482		2/21/01	State of Delaware 2000 Annual Franchise Tax Report for Warrick	
483		2/21/02	State of Delaware 2001 Annual Franchise Tax Report for Warrick	

Ex.	Prod. No.	Date	Description	Objections
484		2/26/03	State of Delaware 2002 Annual Franchise Tax Report for Warrick	
485		2/3/04	State of Delaware 2003 Annual Franchise Tax Report for Warrick	
486		2/23/05	State of Delaware 2004 Annual Franchise Tax Report for Warrick	
487	WCT0145320-37	3/22/02	Schering Corporation Contracts & Pricing fax Kevin Kendell to Raman Kapur re: 1993 Master and Pharmaceutical Pricing Agreements for Secretary of Veterans Affairs and Warrick	
488	WCT0031655-56	2/3/99	Memo F. Finnie to J. Caso re: Albuterol Inhaler Back-Order	
489	SPF0084011-14	2/3/00	Email John Vanschaften to Mark Nolan, Kathleen Flynn, Serafina Oxner and Darren Ray re: Warrick Managed Price List – 1/01/00	
490	WAR0044386	8/23/99	Warrick Managed Care Pricing	
491		7/16/04	Warrick letter Janice Brennan to David Parrella re: Warrick Pricing Update for the Month Ending 6/30/04	
492	SPF0241686	5/5/00	E-mail Debbie Kane to Greg Birch and others re: Price Alert!	

Ex.	Prod. No.	Date	Description	Objections
493	SW0466235-36; SPF0222662	7/19-20/00; 7/19/00	Schering Corporation e-mails Janice Brennan to Mike Walsh and Dan Harkins re: AWP Price List Distributions Schering Corporation e-mails between Janice Brennan and Karen Yutsus re: Req's for Price Lists	
494	WCT0145066-67	9/3/93	Warrick letter Harvey Weintraub to Karen Green re: New Albuterol Sulfate Package Size	
495	WCT0144809	10/12/93	Warrick letter Harvey Weintraub to Don Rodriguez re: Albuterol Sulfate Price Change	
496	SPF0084328-33	8/14/00	Warrick email Dan Valerio to Harvey Weintraub re: Redbook Omissions Letter to Linda Panke	
497	SPF00017394-95	12/10/02	E-mail Brian Longstreet to Olav Hellebo among others re: Rebetol/Ribavirin Retail Pharmacy Strategy	
498	WCT0000879	9/8/99	Letter Bindley Western's Christopher Worrell to Warrick's Al Graf re: manipulation of pricing	
499	WCT0001285-96		PowerPoint Slides re: Rebates	
500	WCT0001297-302	10/1/96	Warrick Market Share Rebate Documentation – Rebates – Procedural Guidelines	

Ex.	Prod. No.	Date	Description	Objections
501	SW0398802-05	2/13/02	Warrick Rebate Programs	
502	SPF0088047-48	7/9/02	E-mail Lilly Kritou to Brian Block and others re: Warrick Rebate Programs	
503	WCT0012823-24		Warrick Individual Prices and Promotion	
504	WCT0001278-80	5/15/98	Warrick Trade Rebates – Generic Division PowerPoint Presentation by Jackie Mobley	
505	WAR0072317-36		Free Goods Summary	
506	WCT0145547	3/31/00	Warrick and Schering TRAM Enhancement Requirements re: Market Share Rebate Claims	
507	WCT0145245-48	12/12/94	Warrick letter Walter Gough to Jerry Kern re: Total Line Rebate Program	
508	WCT0145176-7	12/10/93	Warrick Proposal with Walgreen	
509	WCT0145178	1/3/96	Warrick letter Jerome Sherman to Bob Breetz re: Albuterol Program	
510	WCT0145169-72	8/4/94	Warrick letter Walter Gough to Paul Beahm re: Total Line Rebate Program	
511	WCT0145316-19	6/24/99	Fax Eckerd's Beatrice Vines to Warrick's Paul Thompson re: Executed Total Line Rebate Agreement	
512	Withdrawn	8/7/96	Warrick letter Penny Malcolm to Anthony Tavolaro re: Rebate Program	

Ex.	Prod. No.	Date	Description	Objections
513	Withdrawn	10/31/96	Warrick letter Penny Malcolm to Anthony Tavolaro re: Rebate Program	
514	Withdrawn	4/25/97	Warrick letter Penny Malcolm to Anthony Tavolaro re: Rebate Program	
515	Withdrawn	4/7/94	Warrick Albuterol Agreement Terms Schering Sales Accounts	
516	Withdrawn	7/8/93	Schering-Plough Memo L. Weiss to Distribution re: draft news release on Warrick	
517	Withdrawn		Reduction of Medicaid Through Use of Generics	
518	Withdrawn	4/1/97	Schering-Plough Organization Chart	
519	Withdrawn	8/6/93	Contracts & Information Memo Betsy Chorpennig to Richard Zahn re: Warrick Products	
520	Withdrawn	7/7/00	CFI NJ/Central Fill Application for Generic Contract Award Proposal signed by Michael Kennedy	
521	Withdrawn	11/12/96	Contracts and Pricing Memo Kimberly Timko to Linda Zhou re: Rebate Impact of BP Changes	
522	Withdrawn	10/11/02	Schering Labs Memo from Richard Zahn re: Pricing SOPs	
523	WCT0001679-87	12/7/00	Best Price, Medicaid Rebates and Nominal Pricing prepared by Michael Flinn	

Ex.	Prod. No.	Date	Description	Objections
524	Withdrawn		Pricing definition from Schering-Plough Manual defines Net Direct AWP	
525	Withdrawn	7/18/02	E-mail Michael Walsh and others re: Field Trade Account Alignment	
526	Withdrawn	7/1/99	Warrick Trade Rebate Claims Log	
527	Withdrawn	8/9/99	Warrick Memo Jesse Mensah to Michael Kennedy re: 1999 Trade Rebate Claims	
528	Withdrawn	12/7/99	Warrick Memo Jesse Mensah to Michael Kennedy re: 1999 Trade Rebate Claims	
529	Withdrawn	5/24/00	Combined Schering-Plough Report on Warrick/Generic and Brands	
530	Withdrawn		1998 Schering Division Standard Approval Notice includes Schering-Plough and Warrick signoff	
531	Withdrawn	1/10/96	Warrick letter Jerome Sherman to Betty Swansinger of Discount Drug Mart re: Proventil Market Share Program, Rebate Programs, and other off-invoice discounts	
532	Withdrawn	1/3/02	E-mail John Vanschaften to Michael Kennedy and Harvey Weintraub re: Warrick Monthly Price Reporting to All States Medicaid and Formulary Offices	

Ex.	Prod. No.	Date	Description	Objections
533	Withdrawn	5/14/99	Trade Financial Services Memo from M. Nolan re: 1991-1 Medicaid Best Price Changes for Schering and Warrick Products	
534	Withdrawn	5/17/01	TMS Pricing on Warrick AWPIDs	
535	Withdrawn	8/6/99	Warrick Telemarketing Sales Records for 1999	
536	Withdrawn	3/6/97	Warrick letter Louis Manfredi to Thelma Underwood of Arkansas Medicaid enclosing Product Line Report	
537	Withdrawn	6/18/03	Schering-Plough email Michaela Lukanski to Louisiana and others re: LAM Offer Form	
538	Withdrawn	4/27/98	Memo R. D oliveux to Raul Cesan re: Respiratory Risk Share Proposal and ITG	
539	Withdrawn	2/22/99	Memo Richard Zahn to Raul Cesan re: Cigna Contract Proposal	
540	Withdrawn		Schering Labs Memo Greg Birch and Debbie Kane to Richard Zahn re: Medicare Analysis	
541	Withdrawn		Chain Store Initiatives.	
542	Withdrawn	7/11/97	Memorandum from Joann Androconis to Greg Novell re: Proventil HFA Backgrounder	

Ex.	Prod. No.	Date	Description	Objections
543	Withdrawn		Warrick Pharmaceuticals Policy and Procedure Manual	
544	Withdrawn		1998 Schering Plough 1998 Goals Report- Strategic	
545	Withdrawn		1999 Schering Plough 1999 Goals Report	
546	Withdrawn		1998 Schering Plough Goals Report- 1998 Operating Plan- Financial	
547	Withdrawn		1997 Schering Plough 1997 Goals Report- 1997 Operating Plan	
548	Withdrawn	4/16/03	Message from Lisa Davis to Glyndon Kennerly re: CTRA does not state payments for suits.	
549	Withdrawn	1/15/03	Email from Lisa Davis to Karen Klemm, Marilyn Davis re: Check Request Question	
550	Withdrawn	1/7/03	Check Requests from Schering Plough to Steven O'Day of John Wayne Cancer Institute re Intron A testing.	
551	Withdrawn		ECAP 2003 Projected Payments (2003 Mo. Trial Bgts)	
552	Withdrawn		ECAP 2003 TIMS Report 2003 Estimates	

Ex.	Prod. No.	Date	Description	Objections
553	Withdrawn	9/29/99	Email chain and attached Net Direct Price List from Christine Baker to Joan Crout re: Net Direct Price/ Brief Product Description List (price increase Integrilin)	
554	Withdrawn		Temodar Sales Report	
555	Withdrawn		Intron Sales Report	
556	Withdrawn	6/14/00	Letter and attachments from James Conti Schering Plough) to Robin Zeal (Prescription Solutions) re: 2.5 million rebate for the 1998 through 1999 settlement.	
557	Withdrawn	8/29/06	Complaint United States v. Schering Sales Corporation 06-cr-10250	
558	Withdrawn	8/24/06	Letter from Michael J. Sullivan (US Attorney, District of Massachusetts) to Brien T. O'Connor (Ropes & Gray) re: United States v. Schering Sales Corporation Settlement Agreement	
559		8/24/06	Settlement Agreement between United States of American and Schering Plough Corporation	

Ex.	Prod. No.	Date	Description	Objections
560		8/25/06	Addendum to Corporate Integrity Agreement Between the Office of Inspector General of the Department of Health and Human Services and Schering-Plough Corporation	
561		8/24/06	Letter from Michael J. Sullivan (US Attorney, District of Massachusetts) to Brien T. O'Connor (Ropes & Gray) re: Side Letter Agreement with Schering Plough Corporation	
562		8/29/06	Press Release re: Schering to Pay \$435 Million for the Improper Marketing of Drugs and Medicaid Fraud	
563	SPF0254288-444	5/7/01	Email and attachments from Penny Malcom to Christian Nazar, Ronald Martin, Michael Walsh, Peter Kamins, Ronald Martino, Gary Gavan, and Frank Diascia re: Proventil HFA/Lotrisone Lotion Rebate	

Ex.	Prod. No.	Date	Description	Objections
564	SPF0254445-53	5/7/01	Email and attachments from Penny Malcom to Frank Dilascia, Peter Kamins, Ronald Martin, Ronald Marino, Charles McDonald, Galvan Charles, Christian Nazar, and Michael Walsh re: Rebate Program	
565	SW0579097-103		Business Rationale for ITG I.T. Reengineering Investment	
566	SW0578838-82		Overview of Disease Management Program	
567	SW0578773-6	5/14/98	Schering Plough Account Proposal for Prescription Solutions	
568	SW0578539-42	10/21/99	Schering Plough Memorandum from Roch D oliveux and Len Camarda re: Managed Care/Health Management Organization	
569	SW0578756-7	6/23/99	Memorandum from Rich Zahn to Raul E. Cesan re: Protect and Grow Strategy for Foundation Health Systems	
570	SW05791949-81	3/29/00	Roch D oliveux Interview re: Rebates	
571	WCT10145476	5/31/01	Memorandum from Harvey Weintraub to Mr. R. Cesan re: Albuterol Inhaler- Price Change Recommendation	

Ex.	Prod. No.	Date	Description	Objections
572	SPF00017238-79	12/13/01	Email and attachment from Keith McCormick to Brian Longstreet re: Grants 2000-2001	
573	SPF00022745-46	11/2/01	Schering Plough Memorandum from Richard Zahn to Steve Andrzejewski, Joe Caso, Anne Fields, Bill Heiden, and Jim Mackey re: Product Pricing	
574	SW0724651-54	4/20/00	Letter from B. Michael Kennedy to Mr. William Shrigley re: Sales made by Schering Plough to drug repackagers and relabelers	
575	WAR0072962-88		Spreadsheet Schering-Plough and Warrick Pharmaceuticals	
576	SW0676381		Agreement between Schering Corporation and TDI Managed Care Services, Inc.	
577	SW0674485-95	8/98	Medicaid Drug Rebate Operational Training Guide	
578	SW0689920-23		OBI Reallocation	
579	SW0674027-39		S-P Managed Care/ITG Transform MCOs Into Advocates Creative Contracting	
580	SW0741559-80		Managed Care Memorandum/Proventil	

Ex.	Prod. No.	Date	Description	Objections
581	WAR0055877-81	5/5/00	Letter from Tom Bliley (US House of Representatives Committee on Commerce) to Mr. Raman Kapur (Warrick) re: Pricing practices for Medicare pharmaceuticals	
582	WAR0055875-6	10/18/99	Letter from Tom Bliley (US House of Representatives Committee on Commerce) to Mr. Richard Kogan (Schering Plough) re: how Schering Plough calculates AWP for Albuterol sulfate	
583	WAR0055871-4	7/19/99	Letter from Tom Bliley (US House of Representatives Committee on Commerce) to Mr. Raman Kapur (Warrick) Re inquiry into establishing prices for the Medicare reimbursements	
584	WAR0002581-82		Main Frame systems instructions for Reflections	
585	WAR0002516-17		Total Line Rebate Procedure	
586	WAR0002512-13		Bill Back rebate instructions	
587	WAR0006314-20	6/21/96	Memo and attached minutes from L. Manfredi to Distribution re: Sales Directors Meeting June 17/18, 1996	

Ex.	Prod. No.	Date	Description	Objections
588	SPF0045734-79	8/28/00	Slide Show by Bruce Wallace re: Managed Care/Health Management	
589	SW0739203-10		Audit Report No. 97-105, Schering Laboratories, Wholesaler Chargeback, Amerisource Corporation, Eden Prairie, Minnesota	
590	Withdrawn	2/2/00	Letter from Frank J. DiLascia to Jim Finocchi re: Schering Plough offering to A&P Supermarket Service Corporation program for the year 2000 for Proventil	
591	SW0739082-6	1/31/00	Letter from Frank J. DiLascia to Barrett Moravec re Schering Plough offering to ABCO Markets, Inc. program for the year 2000 for Proventil	
592	SW0739087-93	7/24/00	Letter from Frank J. DiLascia to Dave Vucurevich re: Schering Plough offering to Albertson, Inc. program for the year 2000 for Proventil	
593	SW0739094-98	7/24/00	Letter from Frank J. DiLascia to Tony Mihelich re: Schering Plough offering to American Drug Stores, Inc. program for the year 2000 for Proventil	
594	WAR0001301	10/25/99	Top 20 Medicaid Products 3Q99' Filing	

Ex.	Prod. No.	Date	Description	Objections
595	Withdrawn		Slideshow by Carolyn J. McElroy re: Special Report Marketing Practices and Rebate Issues: Are They on a Collision Course?	
596	Withdrawn		March, 2000 Slideshow: Legal Issues Managed Care/ Health Management National Meeting.	
597	WCT0145349-66	10/1/93	Agreement between Warrick and Bi-Coastal Pharmaceuticals re: employment as sales broker	
598	Withdrawn	12/2/97	Agreement between Cardinal Health and Warrick re: authorized distributor	
599	WCT0145426-30	3/1/00	Executed copies of Total Line Rebate Agreement between Warrick and Eckerd	
600	Withdrawn		Warrick Rebates	
601	SPW0039145	9/21/95	Letter from Jerome Sherman to Bill Folk re price increase of Albuterol Sulfate	
602	WAR0031011-13	12/20/00	Letter from Jesse Mensah to Bev Campbell re Warrick Promotion Rebate	
603	Withdrawn	2/16/01	Memo to Mark Ritchey from Jerome Sherman re New Product Proposal – Oxaprozin Tablets	

Ex.	Prod. No.	Date	Description	Objections
604	Withdrawn	5/8/97	Letter from Jerome Sherman to Bill Roth with attached Cardinal Health Generic Wholesale Service Agreement dated 3/1/97	
605	WAR0000533-35	6/8/99; 11/30/99	Memos to Samantha Vossenberg from Jerome Sherman re Price Change Albuterol, USP Inhalation Aerosol	
606	SPW0042151	10/12/93	Letter from Henry Weintraub to Beth Rader and Ed Edlestein re price change for albuterol sulfate	
607	SPW0038879	11/22/95	Memo from P. Simoradzki to C. Hagman re price of Albuterol, USP Inhalation Aerosol	
608	Withdrawn		Harvey Weintraub Curriculum Vitae	
609	RGX 0001208-17	12/90	Generics – Generics Paper Managed Care by J. Audibeft (sp)	
610	RGX 0001223	4/26/99	Warrick Account Information Form re price change to Albuterol Solution/Syrup	
611	RGX 0001224	6/13/97	Warrick Account Information Form re rebate change to Albuterol Solution/Syrup	
612	RGX 0001225-31	6/2/99; 3/16/99; 4/9/99; 4/22/99; 5/3/99; 7/2/99	Warrick Account Information Forms re price change or rebate change to Albuterol Solution/Syrup	

Ex.	Prod. No.	Date	Description	Objections
613	RGX 0001232	2/23/95	Letter from Henry Weintraub to Martha McNeil re price increase for Albuterol Solution 0.5% 20 mL	
614	RGX 0001233	9/22/95	Letter from Henry Weintraub to Martha McNeil re price increase for Albuterol Sulfate, USP Solution for Inhalation 0.5% 20 mL	
615	WP00002769A	6/25/96	Warrick Promotion Agreement re Albuterol Inhalers	
616	Withdrawn		Handwritten notes	
617	WP00012322A-24A	7/5/95	Handwritten notes re Albuterol Solution 20 mL pricing	
618	WP00012330A		Handwritten notes re AWP	
619	WP00012629A-33A	8/11/95; 9/7/95; 9/18/95; 9/29/95; 12/4/95	Warrick Memos re Albuterol pricing	
620	WPX0007678	12/11/95	Memo from D. Reich to R. Bucko re Warrick Inhaler Invoicing	
621	RGX 0001522		Warrick Pharmaceuticals promotional piece for Albuterol	
622	Withdrawn	5/5/95	Letter from Lee Edelstein to Harvey Weintraub re sales results for Warrick Telemarketing Team	
623	Withdrawn	6/7/95	Letter from Henry Weintraub to Martha McNeill re Cimetidine pricing	

Ex.	Prod. No.	Date	Description	Objections
624	RGX 0001525-28	9/29/94	Letter from Martha McNeill to R. Kapur re Texas Medicaid reimbursement for Perphenazine	
625	RGX 0001529-30	11/16/95	Letter from Harvey Weintraub to Martha McNeill re Perphenazine AWP price change	
626	WWV0020655-64	4/1/95 – 10/1/99	Schering-Plough Generics Organization Charts	
627	WWV0000007	4/1/00	Schering-Plough Generics Organization Chart	
628	WWV0011385-476		Warrick Pharmaceuticals Policy & Procedure	
629	WAR0035149	8/11/95	Memo from Harvey Weintraub to Joseph LaRosa re price increase for Albuterol Solution for Inhalation 20 ml	
630	SPW0037832; SWP0037686	12/21/95; 2/23/95	Letter from Harvey Weintraub to Beth Rader re Albuterol pricing; Letter from Harvey Weintraub to Wyndy Jones re Albuterol pricing	
631	WAR0007632-33	12/29/95	Letter from Harvey Weintraub to Wyndy Jones re Albuterol pricing	
632	WAR0007634-35	12/29/95	Letter from Harvey Weintraub to Mukesh Mehta re Albuterol pricing	
633	WAR0024086	2/23/95	Letter from Harvey Weintraub to Beth Rader re Albuterol pricing	

Ex.	Prod. No.	Date	Description	Objections
634	WAR0016011	3/28/96	Memo to Douglas Batezal from Walt Gough re Albuterol Price Change	
635	WAR0016690	4/16/96	Memo to Anthony Tavolaro from Jerome Sherman re Albuterol Price Change	
636	WAR0054545	6/11/93	Memo from frank Musat to Gary Binder re Warrick Albuterol Pricing	
637	WAR0006120-21	7/23/93	Memo from Harvey Weintraub to Mr. Zahn re Warrick pricing	
638	SPW013818-22	7/29/97; 9/21/95; 7/23/97; 9/21/95; 4/6/94	Documents between Warrick and Walgreens re Albuterol pricing and rebates 9/1/95 Letter from Al Graf to John Ziebell	
639	WAR0025397	4/17/96	Memo to John Ziebell from Al Graf re Albuterol Price Change	
640	SPW0038585	2/99	Addendum to 10/1/98 agreement between Schering Corporation and Scott & White Prescription Services	
641	SPW0038586	2/99	Exhibit A to Addendum to 10/1/98 agreement between Schering Corporation and Scott & White Prescription Services	
642	SPW0038587	2/99	Exhibit A-1 to Addendum to 10/1/98 agreement between Schering Corporation and Scott & White Prescription Services	

Ex.	Prod. No.	Date	Description	Objections
643	SPW0038590		Document titled "Owens Healthcare Inc. Alternate Site Expiring 3/31/99	
644	SPW0038591-2		Pharmacy Perspective Proventil/Albuterol	
645	SPW0038593-94		Integration of Warrick Into Managed Care	
646	SPW0038595	4/23/96	Memo from John Stockton to Betsy Chorpenning and David Reich re Warrick Contract for Rx America	
647	SPW0038596-97	8/3/95	Memo from Patti Niehaus to Cheryl Burrell re PCA Health Plan of FL	
648	SPW0038514		Query SQL	
649	SPW0038515		MCR DB2 Data	
650	SPW0038516		Untitled Chart	
651			SPW/AWP 2001-2004 Call Notes Sales Rep: Flynn, Mark (4 pages)	
652	WAR0054519-28	5/20/93	Memo from Richard Zahn to Raul Cesan re Generic Albuterol Solution/Syrup Introduction	
653	SW0584152-78	6/22/99	Memo from Jim Fitzpatrick to Raul Cesan, et al. re ITG Business Review	
654	SW0582348-62		Handwritten notes of Gary Binder to Roch D oliveux with attachments re AWP	
655	SPF0023186-93	6/21/00	E-mail from Linda Zhou to Raul Cesan re Medco with attachments	
656	SPW0039700-12		Profit Optimization of Current Portfolio Proventil Inhaler	

Ex.	Prod. No.	Date	Description	Objections
657	SW0648205-6	7/24/98	Memo from Richard Zahn to Raul Cesan re Pacificare	
658	SPW0039146	9/21/95	Letter from Walt Gough to Douglas Batezel re Albuterol Price Increase	
659			AWP/SPW 2001-2004 Call Notes Sales Rep.: Butler, James R. (3 pages)	
660			SPW/AWP 2001-2004 Call Notes Sales Rep: Bishop, Gary (11 pages)	
661	SPF0112246-53	6/28/02	E-mail from Ellen Schwarzberg to Anne Fields, et al. re clarification of expense categories in EER with attached Spending Policy Quick Reference Guide	
662	SPW0039228-29	12/1/01	Letter from John Van Schaften to Martha McNeill re Warrick Pharmaceuticals Pricing Update for the Month ending 11/30/01	
663	SPW0039230-32	11/30/01	Letter from John Van Schaften to Martha McNeill re Warrick Pharmaceuticals Pricing Update for the Period ending 11/16/01 to 11/30/01	
664	SPW0039233-36	2/2/00	Contact Report	
665	SPW0039237-39	11/29/01	Affidavit of John Van Schaften In Opposition to Motions to Compel	

Ex.	Prod. No.	Date	Description	Objections
666	SPW0039240		Letter from John Van Schaften to Martha McNeill re Warrick Albuterol Inhalers pricing	
667	SPW0039241-46	2/12/97	Memo from John Van Schaften to Robert Inserra re McKesson auto-sub charges	
668	SPW0039247-50	7/9/01	Contact Report	
669	SPW0039251	4/9/01	Warrick Promotional Agreement	
670	SPW0039252-55	3/20/01	Contact Report	
671	SPW0040619	6/15/99	Memo to Martha Torres from Jerome Sherman re Albuterol Price Change	
672	SPW0040620	6/15/99	Memo to Martha Torres from Jerome Sherman re Albuterol Price Change	
673	SPW0040621-50		Warrick Pharmaceuticals Discount Check Promotions	
674	SPW0040831	9/16/98	E-mail from John Van Schaften to Jesse Mensah re McKesson August '98 Autosub Invoice	
675	SPW0040832-37		Charts re Warrick Pharmaceuticals rebates	
676	SPW0038973	5/24/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	
677	SPW0038974	6/4/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	

Ex.	Prod. No.	Date	Description	Objections
678	SPW0038975	8/7/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	
679	SPW0038976	8/23/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol Auto Sub Program	
680	SPW0038977	10/14/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol	
681	SPW0038978	12/10/96	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	
682	SPW0038979	4/4/97	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	
683	SPW0038980	10/8/97	Warrick Account Information Form Albuterol USP Inhalation Aerosol price change	
684	SPW0038988-89	7/31/97	Letter from Lee Edelstein to Harvey Weintraub re Warrick Telesales	
685	SPW0038992-93	4/25/01	Warrick Promotion Agreement	
686	SPW0038997-9076		Telemanagement Services, Inc. – Telephone Communication Skills Training – Module 1	

Ex.	Prod. No.	Date	Description	Objections
687	SPW0039658-70; SPW0039656-57		Document titled “Schering Warrick- Albuterol Inhaler- Action Plan” prepared by Steve Cooper and Mark Calabrese	
688	SPW0039671		Slide: Modeling Assumptions	
689	SPW0039675-718	4/93	Schering Laboratories Generic Market Strategic Plan	
690	SPW0039719		File Folder labeled “Generics – Keys In Generic Task Force Slides”	
691	SPW0039720-65		Keys In Generic Task Force Slides	
692	SPW0039839-45		Untitled document	
693	SPW0039846-47		Pharmacy Perspective slide and MCO Perspective Slide	
694	SPW0039848-51		Proventil AP Launch Strategy and Transition Plan	
695	SPW0039852-54	10/2/95	Memo from Carolyn Kocis to Lissa Colantouno re RGPN Committed Contract Warrick	
696	SPW0039855-58	2/2/96	Memo from Carolyn Kocis to Cheryl Leone re RGPN-Warrick Albuterol Inhaler	
697	SPW0039865	6/10/93	Memo from Richard Zahn to Raul Cesan re Albuterol Solution/Syrup Warrick Update	
698	SPW0039545-46	7/96	Warrick Customer Rebate Credit/Refund Checks form	

Ex.	Prod. No.	Date	Description	Objections
699	SPW0039563-64	9/20/95; 9/21/95	Letter from Jerome Sherman to James Finocchi re Abuterol price change with fax cover	
700	SPW0039580-81		Warrick Pharmaceutical Rebate Program	
701	SW0002244	3/4/02	March 4, 2002 Memo from Harvey Weintraub to Debbie Kane and Craig Masker	
702	SW0301657-72		Contract Admin. PPT.	
703	SW0398766-77		Schering-Plough Audit Report No. 2001-034 of Warrick	
704	SW0398782-94		Schering-Plough Audit Report Warrick Response	
705			FENS 2464-0001019475 3-page Email chain re: Claims with Admin Fees based on AWP Gross Sales x 1.7%	
706			FENS 2464-0001034096 20-page Contracts and Pricing Rebate Administration Prelim. Assessment May 20, 1998	
707	Withdrawn		February 2000 Schering-Plough updated version of the "Schering Sales Corporation Policy and Procedure Manual"	
708	Withdrawn		February 2003 (last update) Schering Sales Corporation "Sales Policy and Procedures" manual	

Ex.	Prod. No.	Date	Description	Objections
709	Withdrawn	4/00/96	Schering-Plough Field Force of the Year 2000, a "how-to" manual	
710	SW00233914-15	6/11/02	Warrick letter Michael Kennedy to Linda Panke at Medical Economics Co. re: pricing and shipping info	
711	SP0012427-29	6/24/98	Schering Corporate Data Sheet	
712	SP0012430	5/29/98	Warrick Corporate Data Sheet	
713	RGX0255855-76		November 2001 Getting Away from AWP: Changing Medicare and Medicaid Drug Reimbursement	
714	SP000939-49	10/15/92	Schering-Plough e-mail from Carolyn Kocis re: Nominal Pricing Meeting draft Executive Summary and Minutes	
715	RGX0035092-94	5/1/00	Warrick fax Harvey Weintraub to Richard Zahn enclosing Price Change Summary sheets re: Mylan and investigates spread	
716	Withdrawn		Various Schering/Warrick Pricing Updates	
717	WCT0022349	9/29/95	Warrick memo Harvey Weintraub to John Hoffman re: Price Increase – Warrick Albuterol Solution 20 mL	
718	WCT0133861-67	9/21/95	Warrick memo Dave Reich to C. Hagman re: Price Change for Albuterol 20 mL	

Ex.	Prod. No.	Date	Description	Objections
719	WCT0031836 WCT0020159 WCT0135036 WCT0002427 WCT0062123 WCT0012093-96 WCT0012923 WCT0020158 WCT0022197 WCT0022248 WCT0022251 WCT0022294 WCT0133363 WCT0012733 WCT0134536 WCT0134608 WCT0134429 WCT0134548 WCT0033785 WCT0134458 WCT0134532 WCT0134421 WCT0134602 WCT0033782 WCT0134420 WCT0134435 WCT0134528 WCT0134601 WCT0134683 WCT0133364-66 WCT0012073 WCT0020023 WAR0024106 WCT0134418 WCT0134517 WCT0134069 WCT0002622 WCT0012197 WCT0012136 WCT0134473 WCT0134565 WCT0002017 WCT0002023 WCT0134561 WCT0002021 WCT0134738 WCT0134469 WCT0002019 WCT0088445 WAR0011812 WCT0033769 WCT0140751 WCT0088434 WCT0022967 WAR0038321 WCT0022408 SW0173547 CT0033756 WCT0033765 WCT0022405 WCT0073045 WCT0134563 WCT0088414 WCT0081579 WCT0073027 WCT0073061 WCT0001963 WCT0022782 WCT0073054 WCT0145570-72 WCT0073082 WCT0001816 WCT0033563 WAR0053173 WCT0033555 WCT0033538 WCT0088454 WCT0033498 WCT0022426 WCT0089861 WCT0089835 WCT0088751 WCT0088821 WCT0089794		Albuterol Price Notices	

Ex.	Prod. No.	Date	Description	Objections
	WCT0089784 WCT0089942 WCT0088721			
720	SPF00013255		Intron-A pricing and reimbursement	
721	SPF00011695-96	7/7/01	E-mails re: Intron Reimbursement Issues- Summary and Calculation of Medicare Reimbursement- Example	
722	SW0720309-56	8/23/02	Intron-A Oncology 2003 Marketing Plan	
723	SW0719241		Cost Analysis for Superficial Bladder Cancer	
724	SPF00011718-20	5/26/00	E-mail Jack Gomm to Jorge Diaz re: DTIC Admin. Analysis for profitability, and reimbursement for Temodar vs. DTIC	
725	SPF00011969-70		Temodar Information Sheet – Off-Label and Reimbursement	
726	SPF00011971-80		PowerPoint Presentation of Temodar: Dispensing Reimbursement and Managed Care	
727	SPF00011691-94	7/19/02	E-mail exchanges between Jorge Diaz, Karen Freeman, Robin Smith and Ray Ledford re: Medicare Reimbursement for Temodar	
728	SW0639131-49		ITG Overview	
729	SPF0092059-64	6/18/99	E-mail James Fitzpatrick to Kathleen Hurtado re: draft ITG Business Review	
730	SW00244298-300		ITG organization chart of employees and the employees accounts	

Ex.	Prod. No.	Date	Description	Objections
731	WCT0145367-75	9/2/97	Fax Peter Janis to Raman Kapur attaching draft TMS Business Review	
732	WCT0146061-76		TMS/Warrick Rebates, Fees, Check Requests and Agreements	
733	WCT0145977-94		TMS/Warrick Pharmacy Rebate Check/Invoice Audit, Invoices, Discount Check Promotion, Product Summary Reports and Check Request	
734		11/14/94	Warrick letter Harvey Weintraub to Lee Edelstein of TMS re: telemarketing and costs	
735	WAR0041583-96	9/12/02	Fax Warrick Pharmaceutical Training for Access Worldwide manual for telemarketing	
736	SW0041080-2		Email from Todd Grisco to Craig Granowitz re: CTC ad BIC data. Attached is 2001 CTC Free Drug (\$) with handwritten notes	
737	SPF0000499-501		Email chain from Aracelia Vila to Kathy Zonca, Holly Wong, Donna Conroy re: Commitment to Care	
738	SPF00019460-1		“Commitment to Care Program” Business Review Major Findings	

Ex.	Prod. No.	Date	Description	Objections
739	SPF00020502-5		Email from Todd Grisco to Douglas Subers, Pilar Villegas, James Fitzpatrick re: 2001 CTC numbers and attaching documents 2001 CTC Free Drug (\$) and CTC Reimbursement Found 2001 Summary	
740	SPF00020506-8		Email from Todd Grisco to James Fitzpatrick re: 2001 CTC Free Drug and attachment	
741	SPF00011517-46		Email and attachment from Agnes DeOcampo to Jorge Diaz re: Possible addition of Intron Drug Replacement in Schering SOP	
742	SPF00011506-16		Email and attachment re: Temo economics. Attachment is "Impact of Financial Burden on Prescribing Patters" slideshow	
743	SW0026577-96		Commitment to Care Charts (McKesson/HDS)	
744	SW0036906-22		Memoranda from Kennedy Mohammed to Linda Hagman re: CTC Credit	

Ex.	Prod. No.	Date	Description	Objections
745	SPF0171131-9		Email and attachments from Steven Petruccelli to Ray Ledford, Joan Chiaviello, Mark Mazo, Jane Detrie, Janet Gusmerotti, Ronald Taylor, Russell Hubbs, Vincent Lawler, Jeff Sherman, Jack Micali Chuck Pearson, Sheri Jepson, Jeffrey Pfister, Thomas Saenz, Mary Metheny, Thomas Lander, Joanne Steele, Scott Yokobosky, Gregory Meadows, Harry Durr re CTC Overview and Flowcharts	
746	FDB-AWP 04170	7/16/02	Letter from Henry Weintraub to Kay Morgan re Albuterol pricing	
747	SP 0012851-54	6/4/93	Memo from R.M. Loughlin to Attendees re Albuterol launch	
748	WP00001515A	11/29/93	Rx Product Introduction/Change Notice re Albuterol Inhalation Aerosol-Warrick	
749	WP00017230A-39A	1/1/94	Consulting Agreement between Schering Corporation and M&H Associates	
750	WPX0007706-07; WPX0007709	Undated; 12/8/95; 11/16/95	Undated filed folder titled "Greens" ; Rx Product Introduction/Change Notice re Albuterol Inhalation Aerosol	

Ex.	Prod. No.	Date	Description	Objections
751	WPX0007676	12/6/95	Memo from P. Sinoradzki to C. Hagman re Revised Price for Albuterol Sulfate, USP Inhalation Solution 0.05% 20 mL	
752	WP 00017242A; WP 00018934A	9/17/96; 5/29/01	Caremark Prescription invoice for Albuterol; Merk-Medco Rx invoice for Albuterol	
753	WP00012053A-84A	10/96- 10/97	Warrick Pharmaceuticals Policy and Procedure	
754	AGOWP-012498-500	2/28/96	Memo from D. Reich to L. Colantuano/R. Ecker re Warrick Pricing Review	
755	SP 0013845	6/1/93	Memo from Harvey Weintraub to Richard Zahn re Warrick Albuterol- Retail Buying Groups	
756	WP 0038221A-22A	11/8/02	Document titled “Lowest Price Calculation (Effective 11/8/02)” transmitted from H. Weintraub to R. Kapur, R. Gerardino and J. van Schaften	
757	WP 0024172A-75A	3/22/01	Fax from Harvey Weintraub to Jerry Sherman and Walt Gough with attached Price Comparison Report for Effective Date 03/33/2001	
758		9/27/01	Warrick Price File By NDC Desc.	
759	WP00002809A-10A	10/31/96	Warrick Price File By Name	

Ex.	Prod. No.	Date	Description	Objections
760	RGX 0173029-196		Company Policy & Procedure Manual For Field Sales Representatives	
761	RGX 0255855-76	11/01	Getting Away from AWP: Changing Medicare and Medicaid Drug Reimbursement	
762	WPX0003309-20		Rebate Agreement Between The Secretary of Health and Human Services and Warrick Pharmaceuticals Corporation	
763	TX-D 7 W-012307; TX-D 7 W-012309-10	9/3/93	Letter from Henry Weintraub to Beth Rader and Ed Edelstein re new Albuterol package size	
764	TX-D & W-012308; TX-D & W-12305	10/12/93	Letter from Henry Weintraub to Beth Rader and Ed Edelstein re Albuterol price change	
765	WP00001775A	8/26/94	Letter from Angela Glauberzon to Sean O'Connell re Albuterol in the Virginia generic substitution formulary	
766	WP00001629A	12/30/95	Letter from Phyllis Sinoradzki to Michael Neff, Chief, Medi-Cal Contracting Section re Albuterol availability	
767	RGX 0056642	9/12/94	Letter from Henry Weintraub to Beth Radar re Perphenazine pricing	
768	RGX 0056639; RGX 0056666	4/12/95; 11/16/95	Letters from Henry Weintraub to Beth Radar re Perphenazine pricing	

Ex.	Prod. No.	Date	Description	Objections
769	RGX 0086536-44	1/31/02	Warrick Price File By Name	
770	WP00012128A	9/21/95	Letter from Jerome Sherman to Brian Slusser re Albuterol Pricing	
771	RGXA 0098615-23		Handwritten notes re Albuterol pricing	
772	WP00004815A-18A	12/22/95	Letter from Peter Kamins and Henry Weintraub to Michael LaBreque of Jack Eckard Corp. re Proventil Chain Market Share Program	
773	SP0004426; SP0004428	3/15/96	Contract between Warrick and HealthPartners for Albuterol	
774	RGXA 0035102		Medicap Pharmacies, Inc. Generic Vendor Selection Criteria/Generic Product Selection Criteria	
775	RGXA 0085152		Handwritten notes "Action Steps"	
776	SP 0004773-77	1/20/97	Letter to Paul Pelanek of Pharmaceutical Buyers, Inc. from Lissa Colantuono re administration fees with attached price charts	
777	RGX 0002271; RGX 0002310		PharmaGen promotional piece and pricing chart	
778	WP 0023700A	12/3/93	Memo from Harvey Weintraub to Distribution re HCFA - MAC Rulings	
779	RGXA 0035098-102	6/8/95	Letter from Janet Miller of Medicap Pharmacies, Inc. to Jerry Sherman	

Ex.	Prod. No.	Date	Description	Objections
780	RGX 0178842		Potential Discussion Points of Interest to Eckerd's	
781	SP 0002800		Warrick Pharmaceutical product chart	
782	AGOWP-000202; WP00001372A	7/8/99; 3/2/99	Memo from Jerome Sherman to Martha Torres re Albuterol price change; Warrick Account Information Form re price change for Albuterol	
783	RGX 0179000		Preferred Rx Options – Program Features for Branded Pharmaceutical Suppliers	
784	RGX 0068132-33	10/19/98	Memo from Harvey Weintraub to R. Kapur re AWP Warrick ISMN Tablets and Memo from Jerry Sherman to Harvey Weintraub re ISMN Market Information	
785	RGX 0276183	10/26/98	Memo from L. Manfredi to C. Hagman re Isosobide Mononitrate Extended Release Tablets 60mg	
786	WP 0024149A-67A		Telemanagement Services, Inc. Telephone Communications Skills Training Module 2 for Pharmacy Department Representatives	
787	WP00014407A-08A		Access Worldwide – Site Visit Issue	
788	WP00014405A-06A		Possible Issues	

Ex.	Prod. No.	Date	Description	Objections
789	WP 0024115A; WP 0024114A; WP 0024156A	6/25/01; 7/16/01	Letter from Harvey Weintraub to Francine Kositsky re Telemanagement Services Training Manual; Letter from Harvey Weintraub to Francine Kositsky re insert (attached) to Warrick Sales Training Manual for Telemarketers	
790	WP 0024147A	5/1/01	Warrick Pharmaceuticals Discount Check Promotions	
791	RGX 0016763	9/8/98	Memo from R. Kapur to D. Malanga, et al. re Price Reports to Third Parties; AWP, WAC, etc.	
792	WPX0006891	7/26/96	Letter from Joseph E. Davis, State of Maryland DHMH, to Drug Manufacturers re Albuterol pricing	
793	RGXA 0007659-61	7/2/98 (letter)	File folder titled "Arkansas DUR"; Handwritten note to Manfredi from Weintraub; Letter from Thelma Underwood, Arkansas Dept. of Human Services, to L. Manfredi	
794	WP00000838A-42A	3/11/97	Letter from Louis Manfredi to Martha McNeil re Warrick Pharmaceuticals Product Line with attachments	

Ex.	Prod. No.	Date	Description	Objections
795	WFL0094430	3/11/97	Letter from Louis Manfredi to Martha McNeil re Warrick Pharmaceuticals Product Line with attachments	
796	RGX 0190051-69		File folder titled "First Data bank Folder"; letter from Chris Bovard to Janice Brennan with attached Price Report	
797	RGX 0190087-88	12/98	Letter from Chris Bovard to Valued Customer re MDDB product line	
798	FDB-Florida 000468	4/8/02	Letter from Janice Brennan to Marc Shirley re Isosorbide Mononitrate	
799	RGX 0190075-84		National Drug Data File Product Update Report Prepared By First DataBank	
800	RGX 0189706-07	7/16/99	Letter from Lola Nannas of red Book to Pharmaceutical Manufacturers re product pricing	
801	RGXA 0085145	7/16/02	Letter from Harvey Weintraub to Kay Morgan re Albuterol pricing	
802	RGX 0258420	9/6/02	Memo from Janice Brennan to Harvey Weintraub re Redbook – Missing Product Listings – Update	
803	RGX 0258301-10	6/11/02	Letter from B. Kennedy to Linda Panke re Albuterol pricing with attached Pricing Service Listings	

Ex.	Prod. No.	Date	Description	Objections
804	SPF0226510-11	5/20/02	E-mail from R. Kapur to Dan Valerio, et al. re Proventil Solution Launch Mailings	
805	SPF0129237	1/5/02	Email from Janice Brennan to Romilda Heatter re: Warrick Pricing Letters for ME 04/30/02	
806	RGX 0219435	1/2/96	AWP Package Pricing History for Albuterol from Analy\$ource	
807		3/27/06	Notice of Deposition of Defendant Warrick Pharmaceuticals Corporation in State of Wisconsin v. Amgen	
808		2/21/06	Notice of Taking Depositions	
809	RGX 0315084-141	8/12/99	Letter to Thomas Bliley from Richard Zahn	
810	RGX 0154625-48	8/1/97	Memorandum to Distribution from Linda Zhou re: Managed Care/ITG Reporting Package	
811	WP000000065A-67A	10/12/93	Letter to Martha McNeil from Harvey Weintraub	
812			1998 Drug Topics Red Book (Excerpts)	
813			Printout from the National Pharmaceutical Council Website titled "About NPC"	
814		00/00/00	Pharmaceutical Benefits Under State Medical Assistance Programs	
815		8/14/00	Email to Harvey Weintraub from Dan Valerio re: Redbook Omissions Letter	

Ex.	Prod. No.	Date	Description	Objections
816		12/11/97	Memorandum to R. Cesan and R. Zahn from Linda Zhou re Pacificare Proposal Rebate Agreement Between Harvard Pilgrim and Johnson & Johnson	
817	MDL-CEN00055307-13	6/21/02		
818	MDL-CEN00055537-42	2/26/03	Rebate Agreement Between Fallon Clinic and Centocor Inc.	
819	MDL-CEN00013966; 13970; 14835; 14008; 13994; 14027; 13976-77	6/13/01	Composite Exhibit of Price Increase Letters from Ron Krawczyk	
820	MDL-CEN00014234; 13287; 14836; 14231; 14091	11/3/00	Composite Exhibit of Price Increase Letters from Ron Krawczyk	
821	MDL-CEN00014838; 13917-18	3/23/00	Composite Exhibit of Price Increase Letters from Ron Krawczyk	
822	MDL-CEN00000005; 7; 13; 13718	6/18/99	Composite Exhibit of Price Increase Letters from Mike Ziskind & Ron Krawczyk	
823	WKH 01027-28	9/1/98	Price List for Remicade	
824	MDL-CEN00082702-03	3/23/00	Interoffice Memorandum from Tom Weiss re: Remicade 4.9% Price Increase	
825	MDL-CEN00012667		Remicade Price Increase History	
826	MDL-JJ00000108-110	7/8/02	Email from Patricia Molino re: AWP Discrepancy Questions	
827	MDL-JJ00000095-96	6/20/02	Email from William Baxter to Diane Ortiz re: AWP Analysis	
828	MDL-CEN00103688-90	9/22/02	Email from Seth Fischer re: AWP Reporting Issue: an Overview	
829	MDL-OBI00007620	7/11/01	Email from Timothy Traver to Cathleen Dooley re: AWP vs. Acquisition Cost	
830		12/03/03	Amended Notice of Rule 30(B)(6) Depositions	

Ex.	Prod. No.	Date	Description	Objections
831	MDL-CEN00013965; 13969; 14002; 14004; 14008	6/13/01	Composite Exhibit of Price Increase from Ron Krawczyk	
832	MDL-CEN00030466-67	3/16/98	Interoffice Memorandum from Matthew Carpenter to J. McHugh & J. Kerrigan re: Average Acquisition Price vs. Average Acquisition Price	
833	MDL-CEN00005508-10	2/21/02	Email from Michael Ziskind to Rick Anderson re: AWP Pricing Per My Voice Mail	
834	MDL-CEN00055924-88		Centocor Records Retention Schedule – Version 1.0	
835	MDL-CEN00027134-52	1/22/03	Email from John Hoffman to Tom Weiss attaching PBM SPP Strategy	
836	MDL-CEN00014597-98	00/00/01	Remicade RA 2001 Tactical Budget	
837		8/2/05	Notice of 30(B)(6) Deposition of Defendant Centocor Concerning Dealings With Private Insurers and Payors	
838	MDL-CEN00024708-10	8/20/99	Cost Comparison of Anti-TNF Agents in Rheumatoid Arthritis Patients Receiving Methotrexate for Plan & Group Members	
839	MDL-CEN00071590-92	2/22/02	Email from Tony Vernon to Michael Ziskind re: AWP Reporting Issue: An overview	
840	MDL-CEN00030594-610	7/1/02	Email from Cheryl Kramer re: Direction to the Field Sales Organization Re: Flat Infusion Advocacy	
841	MDL-CEN0000711-718	9/24/01	Rebate Agreement – The Regence Group	

Ex.	Prod. No.	Date	Description	Objections
842	MDL-CEN00067957-58	5/22/01	Interoffice Correspondence to Bob Savage from Dave Holveck re: Confidential – Proposed Remicade Price Increase	
843	BMS/AWP/001483100-21	2/4/03	Email from Marsha Peterson to Doug Storer re: POA Powerpoint	
844	BMS/AWP/001487357-62		Smart Practices Require Best Practices from the OTN Website	
845	BMS/AWP/001487883-5001	3/24/03	Memorandum from Marsha Peterson to Gena Cook re: Western Region Summary –April 2003	
846	BMS/AWP/001484077-101	6/6/03	Email from Jim Smith to Marsha Peterson, Joseph Wornson & Gena Cook re: MSHO BID	
847	BMS/AWP/001487993-95	8/19/02	Email from Julie Trueblood re: Gabor Kovacs MD/#200600/Laguna Beach/CA/MOASC	
848	BMS/AWP/001484591-613	2/26/03	Email from Gena Cook to Marsha Peterson & Todd Little re: OHOA with Drug Purchases	
849	RB 03291-304	8/22/95	RedBook Product Listing Verification	
850	RB 03228-242	9/26/96	RedBook Product Listing Verification	
851	AWP-PIPE 00002-000037	11/1/05	BCBS, Pipefitters Local 537 January 1, 2006 Renewal	
852	AWP-PIPE 000038-000065	11/1/00	Pipefitters Local 537 January 1, 2001 Renewal	
853	AWP-PIPE 000066-000093	11/9/98	Pipefitters Local 537 January 1, 1999 Renewal	

Ex.	Prod. No.	Date	Description	Objections
854	AWP-PIPE 000094-000109	9/24/99	Administrative Service Account Agreement	
855	AWP-PIPE 000144A-000159	11/1/03	BCBS Pipefitters Local 537 January 1, 2004 Renewal	
856	AWP-PIPE 000160-000188	10/22/02	BCBS Pipefitters Local 537 January 1, 2003 Renewal	
857	AWP-PIPE 000189-000223	11/2/01	Pipefitters Local 537 January 1, 2002 Renewal	
858	AWP-PIPE 000255-000283	10/25/99	Pipefitters Local 537 January 1, 2000 Renewal	
859	AWP-PIPE 000316-000342	2000	Pipefitters Union Local 537 Health & Welfare Plan Benefits Design	
860	AWP-PIPE 000389-000483		Benefit Description, Major Medical	
861	AWP-PIPE 000518-000522	3/31/03	Wall Street Journal Article "Hired to Cut Costs Firms Find Profits in Generic Drugs	
862	AWP-PIPE 000523-000556	1/1/03	Express Scripts, Inc. Managed Prescription Drug Program Agreement	
863	AWP-PIPE 000599-000607	12/04	Select Pages of Redbook December 2004 Update	
864	AWP-PIPE 000609-000617	7/9/91	Account Agreement Entered Into with BCBS MA	
865	AWP-PIPE 000618-000625	9/8/92	Account Agreement between Blue Cross Blue Shield of Massachusetts and Pipefitters Local	
866	AWP-PIPE 000661-000676	11/30/99	Administrative Services Account Agreement	
867	AWP-PIPE 000680-000766	7/1/98	Master Medical Benefit Description	

Ex.	Prod. No.	Date	Description	Objections
868	AWP-PIPE 000792-000833	-	Master Medical Benefit Description	
869	AWP-PIPE 000834-000920	1/1/04	Benefit Description Master Medical	
870	AWP-PIPE 000921-001008		Pipefitters Local Union 537 Health & Welfare Plan Benefits Description	
871	P 001294-1417	2/00/00	United Food and Commercial Workers Unions and Employers Midwest Health Benefits Plan	
872		11/1/99	Blue Cross Blue Shield of Illinois – Network Administration Agreement	
873	BCBSMA-AWP-00012-27	2/7/04	Analysis of CMS Average Wholesale Price Reform – Reimbursement for Part B Drugs	
874	BCBSMA-AWP-000124-53	7/26/99	Memo Ellen Thompson, Provider Reimbursement, to Ann Meneghetti, Medical Affairs, re: BCBSMA Reimbursement Policy Physician Dispensed RX	
875	BCBSMA-AWP-10002-05	1/00/02	POS Outcomes Newsletter – Injectables: Don't' Get Stuck without a Plan for 2002	
876	BCBSMA-AWP-10569-74		Project Organizational Structure, Team Composition and Responsibilities	
877	BCBSMA-AWP-10586-91		Specialty Pharmacy Overview of RFP Response	
878	BCBSMA-AWP-10592-604		Specialty Pharmacy Overview	

Ex.	Prod. No.	Date	Description	Objections
879	BCBSMA-AWP-10605-08		PFSW Steering Committee Meeting- BC65 Drug Change Impact	
880	BCBSMA-AWP-10609-10	4/26/04	Provider Financial Strategy Workgroup (PFSW)	
881	BCBSMA-AWP-11599-609	12/15/04	Analysis of CMS Average Wholesale Price Reform – Reimbursement for Part B Drugs	
882	BCBSMA-AWP-11610	4/19/04	Email Mike Mulrey to Deb Devaux, Steven Fox, John Killion and Jan Cook re: Impact of CMS Change in Drug Reimbursement	
883	BCBSMA-AWP-11611-12	3/22/04	Email re: Blue Cross Fee Schedule	
884	BCBSMA-AWP-11613-31	1/00/04	Email Jan Cook to Peter Goldbach, Barry Zallen and John Fallon re: BC65 Drug Change Impact with attached analysis	
885	BCBSMA-AWP-12120-46		BCBSMA Organizational Charts	
886	BCBSMA-AWP-12501	7/11/05	Provider Financial Strategy Workgroup (PFSW)	
887	BCBSMA-AWP-12507	6/02/03	Email Deborah Munro to John Killion re: Revised Saving Projections	
888	BCBSMA-AWP-12508-09		Chart – BCBSMA '02 Spend @ Caremark by Drug Name w/extended AWP and Savings Projection based on Offer	

Ex.	Prod. No.	Date	Description	Objections
889	BCBSMA-AWP-12522-24	9/2/03	Email Laura Liscio to Heather Cooke and John Killion re: AAHP Alert: AAHP Medicare Update #03-43a – CMS Published Proposed Rule To Pay Appropriately For Medicare-Covered Drugs	
890	BCBSMA-AWP-12525-50	8/20/03	Federal Register, Department of Health and Human Services, Centers for Medicare and Medicaid Services- 42 CFR Part 405 Medicare Program; Payment Reform for Part B Drugs; Proposed Rule	
891	BCBSMA-AWP-12556-57	6/2/04	Email Janis Pochini to Laura Liscio, Heather Cooke and John Killion re: Final Discounts	
892	BCBSMA-AWP-12558	3/26/04	Email Janis Pochini to John Killion and Laura Liscio re: Confidential Update	
893	BCBSMA-AWP-12568	6/17/03	Email Timothy Fitzgibbons to John Killion, Kim Olson, Annmarie Poopor and Rina Vertes re: Specialty Drug Update	
894	BCBSMA-AWP-12576	2/7/05	Email John Killion to Jan Cook and Holly Grinnell re: AWP Drug Analysis	
895	BCBSMA-AWP-12577-87	12/15/04	Analysis of CMS Average Wholesale Price Reform – Reimbursement for Part B Drugs	

Ex.	Prod. No.	Date	Description	Objections
896	BCBSMA-AWP-12611-12	4/10/05	Interoffice Memo Jan Cook to John Fallon, Deb Devaux and John Killion re: 4/6/05 Meeting with Massachusetts Society of Oncology (MSCO)	
897	BCBSMA-AWP-12960-3001	7/00/00	BCBSMA, Inc. Indemnity Product Ancillary Professional Group Agreement	
898	BCBSMA-AWP-13013-14	3/4/04	Email Jan Cook to others re: Follow up to 2/23/02 Masco meeting	
899	BCBSMA-AWP-13028-38	7/11/05	2005 Hospital Contracting Plan, PFSW	
900	BCBSMA-AWP-13100-10	11/9/05	BCBSMA Outpatient Fee Schedule Update Project	
901	BCBSMA-AWP-17052-54		Website ReimbursementCodes.com - Features and Benefits, New Feature- Medicare Part B vs. Part D Prescription Drug	
902		1/00/99	BCBSMA HMO Blue Products Group Primary Care Physician Agreement	
903		9/00/00	BCBSMA HMO Blue Product Group Primary Care Physician Agreement	
904		11/00/02	BCBSMA HMO Blue Product Group Primary Care Physician Agreement	
905	GSK-MDL-KY04 000344-437	2/6/95	Letter to Charles Wakerly from Timothy Proctor	

Ex.	Prod. No.	Date	Description	Objections
906	GSK-MDL-ZN02-101584-85	2/4/95	Letter to Adriann Carter from Ursula Bartels re: Promotional Complaint	
907	GSK-MDL-KY04 000540-42; GSK-MDL-KY01 005532-42	2/22/95	Letter to Timothy Proctor from Ursula Bartels	
908	GSK-MDL-KY03 000194-227	4/25/95	Letter to Ursula Bartels from Adrianna Carter	
909			Blank	
910		3/14/02	Testimony of Thomas A. Scully, Administrator of Centers for Medicare & Medicaid Services, on Reimbursement & Access to Prescription Drugs under Medicare Part B, Senate Finance Committee, Subcommittee on Health	
911		4/00/03	OIG Compliance Program Guidance for Pharmaceutical Manufacturers	
912		12/15/05	Declaration of Raymond S. Hartman in Support of Plaintiffs' Claim of Liability and Calculation of Damages	
913		12/6/01	Sentencing Memorandum of the United States. <i>United States v. TAP Pharmaceutical Products, Inc.</i> , No. CR-01-10354-WGY (D. Mass. Dec. 6, 2001)	

Ex.	Prod. No.	Date	Description	Objections
914		12/6/01	<i>United States v. TAP Pharmaceutical Products, Inc., No. CR-01-10354-WGY (D. Mass. Dec. 6, 2001) – Disposition</i>	
915	TAP 5030224-458		Document titled “Big Mac Attack – Coach’s Playbook”	
916		9/28/00	Letter from the House of Representative Committee on Ways and Means, Subcommittee on Health, to President of the Pharmaceutical Research and Manufacturers of America	
917		10/31/00	Letter from Congressman Stark to Commissioner of the Food and Drug Administration	
918		12/6/00	Letter from Congressman Stark to Chief Counsel to the HHS Inspector General dated December 6, 2000; and Letter to Nancy-Ann Min DeParle from Thomas Bliley	
919		6/20/03	Department of Justice Press Release “AstraZeneca Pharmaceuticals LP Pleads Guilty to Healthcare Crime: Company Agrees to Pay \$355 Million to Settle Charges”	

Ex.	Prod. No.	Date	Description	Objections
920		1/23/01	Department of Justice Press Release "Bayer to Pay \$14 Million to Settle Claims for Causing Providers to Submit Fraudulent Claims to 45 State Medicaid Programs"	
921	AM0038593-628		Aranesp Playbook Pricing & Contracting	
922	AM0994157-58	12/13/02	Email from Mike Charles re: Important Ortho Competitive Information	
923	AM0933042	4/8/02	Email from Amy Oliver re: Procrit Patient Access Program	
924	AM00793589-98	9/17/04	Ortho Contract Update	
925	AM00163376-79	00/00/04	Analysis by Amgen of the Updated Procrit Physician Office Contract	
926	AM00976106-07	1/9/04	Email from Amy Oliver to Mike Charles re: Economic Analysis Workshop	
927	AM00976108-16	7/1/03	Draft Rebate Agreement	
928	AM0976123-24		Hospital Economic Analysis	
929	AM00976117-18		Physician Office Economic Analysis	
930	AM00976119-20		Physician Office Economic Analysis	
931	AM00976121-22		Hospital Economic Analysis	
932	AM00180375-97		Updated Procrit – Physician Office Contract	
933			Table 1A: Exemplar Defendant Drug List	

Ex.	Prod. No.	Date	Description	Objections
934			Distribution of Supplementary Health Insurance for the Medicare Population, 1996 Fee-for-Service Enrollees	
935	BMSAWP/0011214; BMSAWP/0011221	9/6/1995	Etopophos Launch Plan	
936	BMS/AWP/000157426		Taxane Economics	
937	BMS/AWP/000157428		Weekly Taxol Administration 80 mg/m ²	
938	AZ0037018-19	3/22/95	Memo from Oncology Specialty Marketing Team to Specialty Case Representatives re: New Case Quantity Discount	
939	FDB-AWP 04045	2/28/00	Mailgram from Chris Bovard to Dear Customer	
940	MDL-CEN00004025	11/7/00	Letter from Kelly Petrison to Mike Ziskind	
941	BMSAWP/0011250	10/3/93	Letter from Denise M. Kaszuba to Mr. Edelstein	
942			Page 19 of a Banc of America Securities report re "Health Care Technology and Distribution"	
943		7/2003	Pages 2-5 of a Dyckman & Associates, LLC report titled "Health Plan Payment for Physician-Administered Drugs"	
944	BMS/AWP/000100778		Document titled "Average Wholesale Price (AWP)"	
945	BMS/AWP/000125509	2000	Slide: "Average Whole Price (AWP)"	

Ex.	Prod. No.	Date	Description	Objections
946	BMS/AWP/000101009-10		Slides: "How Drugs are Reimbursed"	
947	BMS/AWP/000192749		Slide: "Variations on AWP or WLP"	
948			Chart: "The Major PMSs All Use The AWP Benchmark In Their Contracts with Heath Plan Clients" (7 pages)	
949			Chart: "The Major PBMs All Use The AWP Benchmark In Their Contracts with Retail Pharmacies" (5 pages)	
950	CVH 000028-31	5/10/04	Document titled "Coventry Heath Care National Retail Pharmacy Agreements"	
951	BMS/AWP/000125508-15	2000	Presentation by Todd Guinn "Drug Pricing"	
952		January 2003	California HealthCare Foundation report: "Navigating the Pharmacy Benefits Marketplace"	
953	SMWMASS 001240-47		Sheet Metal Workers' National Health Fund payment records for Paraplatin	
954	SMWMASS 000605		Sheet Metal Workers' National Health Fund payment records for Cytoxan and Rubex	
955	SMWMASS 000092-96		Sheet Metal Workers' National Health Fund payment records for Procrit	
956	SMWMASS 001174-76		Sheet Metal Workers' National Health Fund payment records for Zoladex	

Ex.	Prod. No.	Date	Description	Objections
957	SMWMASS 000576-80		Sheet Metal Workers' National Health Fund payment records for Albuterol	
958	MDLW 25203-09	4/21/99	Memo from Tim Callahan to Dariush Ashraft, et al. re Pricing Issues	
959	PH 025785-94		Strategic Presentation on Average Wholesale Price (AWP)	
960	MDLW 05457-77		PowerPoint: Pricing & Reimbursement Key Strategies for Success	
961	MDLW 12564	2/24/97	Memo from Tim Callahan to Mike Casey re INFeD Price Strategy	
962	FJ-MDL 005687-89	3/30/95	Memo to Paul Kersten from David Klaum re March 1995 Monthly Report	
963		4/14/03	Complaint for Injunctive Relief, Damages and Other Relief, <i>Dey, L.P. v. First DataBank, Inc.</i> , et al, No. 26-21019, (Sup. Ct. Napa County, CA.)	
964	IAWP008528-29	2/21/97	Memo from John Frande and Keith Bridges re Reimbursement on Immunex products for AOR analysis	
965	IAWP012960-61		Health Care Policy Fast Facts What Happens When We Announce A Price Change For One of Our Products	
966	ABAWP 008988-93	11/92	Reimbursement Alert	

Ex.	Prod. No.	Date	Description	Objections
967	ABAWP 012058-67	4/96	Business to Business A quarterly newsletter from Centeon's Corporate Accounts and Sales Operation	
968		10/2/06	Addendum Attachment A: Damages Summary and Backup – Declaration of Raymond S. Hartman: AWP Litigation Addendum to Liability and Calculation of Damages	
969		10/2/06	Attachment E – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	
970		10/2/06	Attachment G: Calculation of Spreads – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	
971		10/2/06	Attachment H – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	
972		10/2/06	Attachment I – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	

Ex.	Prod. No.	Date	Description	Objections
973		10/2/06	Attachment J: Damage Summary and Backup – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	
974		10/2/06	Attachment L: Additional Spread and Damages Calculation Notes and Assumptions For the October 2, 2006 Revisions – Declaration of Raymond S. Hartman: AWP Litigation In Support of Liability and Calculation of Damages	
975	BAX MDL 0012778	6/11/96	Memo from Hyle A. Bush to Pete O'Malley re AWP/WAC	
976	MDL-OBI00060823-58		Presentation: 1999 Rebate Recommendations	
977	MDL-OBI00001001-2	3/23/97	E-mail from Cathy Dooley to Christine McConnell re Medicare Drug Payment	
978	MDL-OBI00002837	1/6/00	Memo from Elaine Kling re “Urgent – Price Change Notification”	
979	MDL-OBI00061025-6	2/19/97	Memo from C. Dooley to S. Welden re Medicare AWP Drug Reimbursement Proposal	

Ex.	Prod. No.	Date	Description	Objections
980		7/27/04	Responses of Schering-Plough Corporation to Plaintiffs' Interrogatories to the Fast Track Defendants	
981	RRPTOWJ		Centcor, Inc. Remicade Sales Rotation at RA Launch Remicade v. Enbrel - Remicade Masters Sales Aid Site of Care/Reimbursement Issues [DVD]	
982		8/5/02	Presentation – “Procrit Contracting: Modeling Provider Economics”	
982A ⁷	AZ0554945-60	3/26/03	AstraZeneca Contracting - Steven Pitts, Contracting Director – Phoenix Team meeting	
982B	AZ0463307	4/9/03	Email from John Freeberry to David Brennan re: Current Pricing Issues	
982C	AZ0048992-9023	1/15/91	1991 Zoladex Promotional Plan by J. R. Hildreth & C.M. Cook	
982D	AZ0008783-84	6/21/94	Internal Memorandum from Michael Tilton re: Zoladex	
982E	AZ0037020-21		Draft Advertisement for Zoladex	
982F	AZ008092-119	00/00/92	Medical/Marketing Operating Plan 1992	

⁷ On October 9, 2006, Plaintiffs' filed "amended disclosures" including Exhibits 983-1008. Track 1 Defendants and Plaintiffs have conferred regarding the overlap in exhibit numbers caused by these additional exhibits and Plaintiffs have agreed to re-number the exhibits 982A-982Y.

Ex.	Prod. No.	Date	Description	Objections
982G	AZ0048961-91	1994	Zoladex Prostate Cancer 1994 Operational Plan	
982H	AZ0009978-91	1995	Zoladex Prostate Cancer 1995 Operational Plan	
982I	AZ0004273-84	1997	Advanced Prostate Cancer 1997 Operational Plan for Zoladex 3.6mg and 10.8mg and Casodex	
982J	AZ0043795-806	9/16/97	Draft Zoladex Gyn/Breast Cancer 1997 Operational Plan	
982K	AZ0033814-40	10/1/97	1998 Operational Plan – Casodex & Zoladex – October 1, 1997	
982L	AZ0001598-603	1998	Prostate Cancer 1998 Operational Plan for Casodex & Zoladex with Handwritten Notes	
982M	AZ0427138-783	1999	1999 Operational Plan for The Prostate Cancer Portfolio – Casodex & Zoladex	
982N	AZ0432467-80	4/29/02	Email from Connie McDonough to Kathryn Jones re: Zoladex 2003 Product Strategic Plan	
982O	AZ0008130-50	1992-94	Zoladex Medical/Marketing Operational Plan	
982P	AZ0008087-91	1994	Zoladex Medical Marketing Operational Plan	
982Q	AZ0008069-86	1995	Pharma Deliverables Report – Zoladex Medical Marketing Operational Plan	

Ex.	Prod. No.	Date	Description	Objections
982R	AZ0024003-10	8/16/95	Zoladex 3.6mg and 10.8mg Prostate Cancer 1996 Operational Plan – Draft #1	
982S	AZ0389025		Call Notes from AZ Sales Representative Charels Dadonna	
982T	AZ0385646	6/25/00	Call Notes from Dana Nevil, AZ Sales Representative	
982U	AZ0069688-701	5/1/96	Zeneca Pharmaceuticals Agreement – Urology Groups	
982V	PXL00955-67	1/13/99	Letter from Fred Roberts to Marci Calli attaching an 1998-99 executed contract between Parexel & AstraZeneca	
982W	PXL00036-49		Memorandum to Keith Patterson & Cyndee Davies from Sandy Robinson attaching 1994 partially executed contract between Parexel & AstraZeneca	
982X	AZ0036327		Letter to Keith Patterson from Sean Coakley	
982Y	AZ0096323		“An Evening With Ray Painer, M.D.”	

DATED: October 11, 2006.

By /s/ Steve W. Berman

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Edward Notargiacomo (BBO#567636)

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CERTIFICATE OF SERVICE BY LEXISNEXIS FILE & SERVE

Docket No. MDL 1456

I, Steve W. Berman, hereby certify that I am one of plaintiffs' attorneys and that, on October 27, 2006, I caused copies of **PLAINTIFFS' SECOND AMENDED DISCLOSURES PURSUANT TO THE COURT'S AMENDED PRETRIAL ORDER OF AUGUST 21, 2006** to be served on all counsel of record by causing same to be posted electronically via Lexis-Nexis File & Serve and a hard copy of plaintiffs' trial exhibits 174A and 369A-369K by overnight mail to the following:

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